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6

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Richard A. Marshack

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA**

10 In re
11 THE LITIGATION PRACTICE GROUP P.C.,
12 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

13 CHAPTER 11 TRUSTEE'S OMNIBUS
14 OBJECTION TO PROOFS OF CLAIM
15 FILED FOR ALLEGED
16 ADMINISTRATIVE CLAIMS:
17

| Claimant (in Alphabetical Order) | Claim No.* |
|-------------------------------------|--------------------|
| Angel Rivera | C 571- 2113.1 |
| Anita J Green | C 571- 101829.1 |
| Anita L Coots | C 571- 101228.1 |
| Anthony Stredick | C 571- 100314.1 |
| Borhane Kaouache | C 571- 102190.1 |
| Brinder Marshall | C 571- 100618.1 |
| Carlos Bacsal | C 571- 100717.1 |
| Carrie McLaughlin | C 571- 100744.1 |
| Catrice Williams | C 571- 964.1 |
| Celerina Mendez Cruz | C 571- 101488.1 |
| Cheryl Harris | C 571- 101977.1 |
| Chris & Kelly Behnke | C 571- 100280.2 |

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| 1 | Constance Plummer | C 571- 100564.1 |
| 2 | Corissa Hammers | C 571- 101438.1 |
| 3 | Cynthia Clifford | C 571- 101060.1 |
| 4 | David B Waltz | C 571- 101215.1 |
| 5 | Deborah Bonelli | C 571- 100327.1 |
| 6 | Dennis E Theriault | C 571- 101748.1 |
| 7 | Diana J Dalessio | C 571- 101073.1 |
| 8 | Douglas Stiele | C 571- 117.1 |
| 9 | Gerson David Cortes Membreno | C 571- 102214.1 |
| 10 | Giorgio Giardinella | C 571- 101030.1 |
| 11 | Gustavo Romani | C 571- 101933.1 |
| 12 | Haley Simmoneau | C 571- 106.3 |
| 13 | Haley Maree Anderson | C 571- 101573.1 |
| 14 | Hanna Yager | C 571- 101175.1 |
| 15 | Heather Silguero | C 571- 101006.1 |
| 16 | Jacqueline Fomby- Lewis | C 571- 102658.1 |
| 17 | Jason Ryer | C 571- 101272.1 |
| 18 | Jenifer Pelayan | C 571- 102230.1 |
| 19 | Jo Lynn Urlacher | C 571- 100021.1 |
| 20 | Joseph C Takas | C 571- 101969.1 |
| 21 | Joshua Miles | C 571- 100175.1 |
| 22 | Julibelle Quintos | C 571- 101387.1 |
| 23 | Kermic P Basat Jr | C 571- 102205.1 |
| 24 | Kevin Kurka | C 571- 101651.1 |
| 25 | Keysha Everage | C 571- 100496.1 |
| 26 | Kimberly O'Brien | C 571- 100578.1 |
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|----|---|--------------------|
| 1 | Kirsten Campbell | C 571- 100191.1 |
| 2 | Leah Bender; “Other names the creditor used with the debtor: Leah Sweeney” | C 571- 100279.1 |
| 3 | Leann Watson Morales | C 571- 100635.1 |
| 4 | Leda Manookian | C 571- 100301.1 |
| 5 | Lilua Del Rosso | C 571- 100945.1 |
| 6 | Lisa Johnson | C 571- 100344.1 |
| 7 | Lois Ruble | C 571- 100521.1 |
| 8 | Luz Benavides | C 571- 102188.1 |
| 9 | Lynda Denette Wilcox | C 571- 101035.1 |
| 10 | Maria Zilinskas | C 571- 100215.1 |
| 11 | Martin Grams-Stant | C 571- 101928.1 |
| 12 | Marvin Gale & Sara Denise Ray | C 571- 100644.1 |
| 13 | Nabil Ahmed Sarsour | C 571- 101423.1 |
| 14 | Nationwide Appearance Attorneys, LLC | C 571- 101660.1 |
| 15 | Paulo A Cuellar | C 571- 101604.1 |
| 16 | Rebecca Burgett | C 571- 101678.1 |
| 17 | Robert Allen | C 571- 102237.1 |
| 18 | Russell Richardson | C 571- 101159.1 |
| 19 | Rustam Nazarov | C 571- 102310.1 |
| 20 | Sarah Adleman | C 571- 100313.1 |
| 21 | Scott Folda | C 571- 100478.1 |
| 22 | Shalise Dewitt | C 571- 101055.1 |
| 23 | Stephanie Ann Ingram | C 571- 100872.1 |
| 24 | Stephanie Kay Albertson | C 571- 101009.1 |
| 25 | Stephanie Sciacca | C 571- 100476.1 |
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|-------------------|----------------|
| Stephanie Walker | C 571-102009.1 |
| Stephanie Winters | C 571-100939.1 |
| Sydney L Smith | C 571-100090.1 |
| Teresa Booker | C 571-100554.1 |
| Valerie S Furlow | C 571-101749.1 |
| Vernetta A Dotson | C 571-101871.1 |
| Victoria L Harris | C 571-100456.1 |

MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
ALINA MAMYLUK IN SUPPORT

Hearing

Date: November 14, 2024

Time: 11:00 a.m.

Ctrm: 5C - ViaZoom¹

Place: 411 West Fourth Street
Santa Ana, CA 92701

This Objection seeks to disallow or modify certain Proofs of Claim. Claimants receiving this Objection should locate their names and Claims on Exhibit A attached to this Objection.

This is an objection to your claim(s). The objecting parties are asking the Court to disallow or modify the claim(s) that you filed in this bankruptcy case. You should immediately contact the objecting parties or retain counsel to contact the objecting parties to resolve the dispute. If you do not reach an agreement, you must file a response to this objection and send a copy of your response to the objecting parties 14 days before the hearing set forth above. Your response must state why the objection is not valid. If you do not file a response 14 days prior to the hearing, your claim(s) may be disallowed without a hearing.

Represented parties should act through their attorney.

PLEASE TAKE NOTICE that Richard A. Marshack, in his capacity as Chapter 11 Trustee (“Trustee”) of the Litigation Practice Group P.C. (“Debtor”), files this Omnibus Objection to certain proofs of claims who improperly designated their claim as an administrative claim (“Motion”).

The Motion is based on this Notice, the Motion and its accompanying Memorandum of Points and Authorities, the pleadings and files in the Debtor's bankruptcy case, and upon such further oral and documentary evidence as may be presented to the Court.

¹ Check Judge Clarkson's tentative ruling prior to hearing for further Zoom instructions.

1 **NOTICE TO CLAIMANTS IS HEREBY GIVEN:**² the Trustee has filed an objection to
2 your Proof of Claim identified as follows:

| 3 Claimant (in 4 Alphabetical 5 Order) | 6 Claim No.* | 7 File Class | 8 Total Claim 9 Amount | 10 Proposed 11 Amount to be 12 Allowed as 13 Administrative 14 Claim |
|---|--|---|--|---|
| 15 Angel Rivera | 16 C 571- 17 2113.1 | 18 ADM | 19 \$1,600.00 | 20 \$0 |
| 21 Anita J Green | 22 C 571- 23 101829.1 | 24 503(b)(9)- 25 MULTI | 26 \$2,198.52 | 27 \$0 |
| 28 Anita L Coots | 29 C 571- 30 101228.1 | 31 503(b)(9)- 32 MULTI | 33 \$3,640.27 | 34 \$0 |
| 35 Anthony Stredick | 36 C 571- 37 100314.1 | 38 503(b)(9) | 39 \$4,285.40 | 40 \$0 |
| 41 Borhane Kaouache | 42 C 571- 43 102190.1 | 44 503(b)(9) | 45 \$14,000.00 | 46 \$0 |
| 47 Brinder Marshall | 48 C 571- 49 100618.1 | 50 503(b)(9)- 51 MULTI | 52 Various amounts 53 listed in POC | 54 \$0 |
| 55 Carlos Bacsal | 56 C 571- 57 100717.1 | 58 503(b)(9) | 59 \$22,877.40 | 60 \$0 |
| 61 Carrie McLaughlin | 62 C 571- 63 100744.1 | 64 503(b)(9) | 65 \$3,967.32 | 66 \$0 |
| 67 Catrice Williams | 68 C 571- 69 964.1 | 70 ADM | 71 \$3,216.00 | 72 \$0 |
| 73 Celerina Mendez 74 Cruz | 75 C 571- 76 101488.1 | 77 503(b)(9) | 78 \$5,000.00 | 79 \$0 |
| 80 Cheryl Harris | 81 C 571- 82 101977.1 | 83 503(b)(9) | 84 \$5,949.60 | 85 \$0 |
| 86 Chris & Kelly 87 Behnke | 88 C 571- 89 100280.2 | 90 503(b)(9)- 91 MULTI | 92 \$10,103.87 | 93 \$0 |

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27 ² Each Claimant will be served with only a copy of their claim (but not copies of the other claimants'
28 claims). The filed-copy of this Motion and the courtesy copy sent to chambers will attach copies of
all of the subject claims.

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| 1 | Constance Plummer | C 571- 100564.1 | 503(b)(9) | \$7,120.51 | \$0 |
| 2 | Corissa Hammers | C 571- 101438.1 | 503(b)(9) | \$4,699.00 | \$0 |
| 3 | Cynthia Clifford | C 571- 101060.1 | 503(b)(9)- MULTI | \$8,349.33 | \$0 |
| 4 | David B Waltz | C 571- 101215.1 | 503(b)(9) | \$10,000.00 | \$0 |
| 5 | Deborah Bonelli | C 571- 100327.1 | 503(b)(9) | \$6,032.20 | \$0 |
| 6 | Dennis E Theriault | C 571- 101748.1 | 503(b)(9) | \$3,600.00 | \$0 |
| 7 | Diana J Dalessio | C 571- 101073.1 | 503(b)(9) | \$16,560.21 | \$0 |
| 8 | Douglas Stiele | C 571- 117.1 | ADM | \$307,280.00 | \$0 |
| 9 | Gerson David Cortes Membreño | C 571- 102214.1 | 503(b)(9)- MULTI | \$3,181.90 | \$0 |
| 10 | Giorgio Giardinella | C 571- 101030.1 | 503(b)(9)- MULTI | \$11,241.42 | \$0 |
| 11 | Gustavo Romani | C 571- 101933.1 | 503(b)(9)- MULTI | \$10,000.00 | \$0 |
| 12 | Haley Simmoneau | C 571- 106.3 | ADM | \$65,000.00 | \$0 |
| 13 | Haley Maree Anderson | C 571- 101573.1 | 503(b)(9) | \$7,871.75 | \$0 |
| 14 | Hanna Yager | C 571- 101175.1 | 503(b)(9)- MULTI | \$8,622.00 | \$0 |
| 15 | Heather Silguero | C 571- 101006.1 | 503(b)(9) | \$5,000.00 | \$0 |
| 16 | Jacqueline Fomby- Lewis | C 571- 102658.1 | 503(b)(9) | \$21,543.00 | \$0 |
| 17 | Jason Ryer | C 571- 101272.1 | 503(b)(9) | \$9,540.00 | \$0 |
| 18 | Jenifer Pelayan | C 571- 102230.1 | 503(b)(9) | \$3,000.25 | \$0 |

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|----|--|----------------|---------------------|--|-----|
| 1 | Jo Lynn Urlacher | C 571-100021.1 | 503(b)(9) | \$8,370.42 | \$0 |
| 2 | Joseph C Takas | C 571-101969.1 | 503(b)(9) | \$6,648.38 | \$0 |
| 3 | Joshua Miles | C 571-100175.1 | 503(b)(9) | \$20,425.04 | \$0 |
| 4 | Julibelle Quintos | C 571-101387.1 | 503(b)(9) | \$4,341.46 | \$0 |
| 5 | Kermic P Basat Jr | C 571-102205.1 | 503(b)(9) | \$2,367.19 | \$0 |
| 6 | Kevin Kurka | C 571-101651.1 | 503(b)(9)- MULTI | \$7,890.00 | \$0 |
| 7 | Keysha Everage | C 571-100496.1 | 503(b)(9)- MULTI | No amount is listed under 503(b)(9) although total POC is in the amount of \$5,581.63 | \$0 |
| 8 | Kimberly O'Brien | C 571-100578.1 | 503(b)(9) | \$11,147.52 | \$0 |
| 9 | Kirsten Campbell | C 571-100191.1 | 503(b)(9)- MULTI | \$6,118.00 | \$0 |
| 10 | Leah Bender; “Other names the creditor used with the debtor: Leah Sweeney” | C 571-100279.1 | 503(b)(9)- MULTI | No amount is listed under 503(b)(9) although total POC is in the amount of \$25,000.00 | \$0 |
| 11 | Leann Watson Morales | C 571-100635.1 | 503(b)(9) | \$5,828.18 | \$0 |
| 12 | Leda Manookian | C 571-100301.1 | 503(b)(9)- MULTI | \$6,281.55 | \$0 |
| 13 | Lilua Del Rosso | C 571-100945.1 | 503(b)(9)- MULTI | \$5,956.80 | \$0 |

| | | | | | |
|----|--|--------------------|---------------------|---|-----|
| 1 | Lisa Johnson | C 571- 100344.1 | 503(b)(9)- MULTI | No amount is listed under 503(b)(9) although total POC is in the amount of \$1,952.23 | \$0 |
| 2 | Lois Ruble | C 571- 100521.1 | 503(b)(9) | \$3,330.36 | \$0 |
| 3 | Luz Benavides | C 571- 102188.1 | 503(b)(9)- MULTI | \$2,558.80 | \$0 |
| 4 | Lynda Denette Wilcox | C 571- 101035.1 | 503(b)(9)- MULTI | \$6,187.77 | \$0 |
| 5 | Maria Zilinskas | C 571- 100215.1 | 503(b)(9) | \$11,807.00 | \$0 |
| 6 | Martin Grams-Stant | C 571- 101928.1 | 503(b)(9)- MULTI | | \$0 |
| 7 | Marvin Gale & Sara Denise Ray | C 571- 100644.1 | 503(b)(9) | \$13,580.28 | \$0 |
| 8 | Nabil Ahmed Sarsour | C 571- 101423.1 | 503(b)(9)- MULTI | \$9,783.00 | \$0 |
| 9 | Nationwide Appearance Attorneys, LLC | C 571- 101660.1 | 503(b)(9)- MULTI | \$3,400.00 | \$0 |
| 10 | Paulo A Cuellar | C 571- 101604.1 | 503(b)(9) | \$5,132.85 | \$0 |
| 11 | Rebecca Burgett | C 571- 101678.1 | 503(b)(9) | \$3,600.00 | \$0 |
| 12 | Robert Allen | C 571- 102237.1 | 503(b)(9) | \$10,000.00 | \$0 |
| 13 | Russell Richardson | C 571- 101159.1 | 503(b)(9)- MULTI | | \$0 |
| 14 | Rustam Nazarov | C 571- 102310.1 | 503(b)(9) | \$3,328.00 | \$0 |
| 15 | Sarah Adleman | C 571- 100313.1 | 503(b)(9)- MULTI | \$10,723.50 | \$0 |

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| 1 | Scott Folda | C 571-100478.1 | 503(b)(9) | \$23,318.51 | \$0 |
| 2 | Shalise Dewitt | C 571-101055.1 | 503(b)(9)- MULTI | \$3,574.56 | \$0 |
| 3 | Stephanie Ann Ingram | C 571-100872.1 | 503(b)(9) | \$5,000.00 | \$0 |
| 4 | Stephanie Kay Albertson | C 571-101009.1 | 503(b)(9)- MULTI | \$16,668.00 | \$0 |
| 5 | Stephanie Sciacca | C 571-100476.1 | 503(b)(9) | \$1,918.50 | \$0 |
| 6 | Stephanie Walker | C 571-102009.1 | 503(b)(9)- MULTI | \$2,669.69 | \$0 |
| 7 | Stephanie Winters | C 571-100939.1 | 503(b)(9) | \$6,392.04 | \$0 |
| 8 | Sydney L Smith | C 571-100090.1 | 503(b)(9)- MULTI | | \$0 |
| 9 | Teresa Booker | C 571-100554.1 | 503(b)(9) | \$10,711.40 | \$0 |
| 10 | Valerie S Furlow | C 571-101749.1 | 503(b)(9) | \$16,706.41 | \$0 |
| 11 | Vernetta A Dotson | C 571-101871.1 | 503(b)(9) | \$4,600.00 | \$0 |
| 12 | Victoria L Harris | C 571-100456.1 | 503(b)(9) | \$3,996.00 | \$0 |

The Motion seeks to alter your rights by disallowing, reducing, or modifying your Proof of Claim based on the grounds set forth in the Motion detailed below.

PLEASE TAKE FURTHER NOTICE that any response as to the proposed objections must be in the form as required by Rule 9013-1(f) of the Local Bankruptcy Rules (“LBR”) and filed with the Clerk of the above-entitled Court no later than 14 days prior to the hearing date set forth above, and a copy served on D. Edward Hays and Aaron E. de Leest at the address indicated above. A copy of any response must also be served on the Office of the United States Trustee, 411 West Fourth Street, Suite 7160, Santa Ana, CA 92701-4593.

1 Failure to timely respond may be deemed as acceptance of the proposed objections and the
2 Court may grant the relief requested in the Objection Motion without further notice or hearing. *See*
3 LBR 3007-1(b) and 9013-1(h).

4
5 DATED: September 20, 2024

MARSHACK HAYS WOOD LLP

6 By: /s/ Aaron E. de Leest
7 D. EDWARD HAYS
8 AARON E. DE LEEST
ALINA MAMLYUK
9 General Counsel for Chapter 11 Trustee,
Richard A. Marshack

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| 19 | <i>Boeing North America, Inc. v. Ybarra (In re Ybarra),</i> 424 F.3d 1018, 1025 (9th Cir. 2005) | 20 |

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|----|--|--------|
| 1 | <i>Brown & Cole Stores, LLC v. Associated Grocers, Inc. (In re Brown & Cole Stores, LLC),</i> | |
| 2 | 375 B.R. 873, 878 n. 7 (B.A.P. 9th Cir. 2007) | 19 |
| 3 | <i>Dreyfuss v. Cory (In re Cloobeck),</i> | |
| 4 | 788 F.3d 1243 (9th Cir. 2015) | 21 |
| 5 | <i>In re Holms,</i> | |
| 6 | 931 F.2d 620 (9th Cir. 1991) | 18 |
| 7 | <i>In re Hydorn,</i> | |
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| 10 | 114 B.R. 40 (Bankr. S.D.N.Y. 1990)..... | 18 |
| 11 | <i>In re Lundell,</i> | |
| 12 | 223 F.3d 1035, 1039 (9th Cir. 2000). | 18 |
| 13 | <i>In re Richfield Equities, L.L.C.,</i> | |
| 14 | 556 B.R. 313, 318 (Bankr. E.D. Mich. 2016)..... | 20 |
| 15 | <i>Microsoft Corp. v. DAK Industries (In re DAK Industries),</i> | |
| 16 | 66 F.3d 1091, 1094 (9th Cir. 1995) | 18, 22 |
| 17 | <i>NL Indus. v. GHR Energy Corp.,</i> | |
| 18 | 940 F.2d 957 (5th Cir. 1991) | 20 |
| 19 | <i>PacifiCorp v. N. Pac. Canners & Packers, Inc.</i> (D.Or. Feb. 3, 2023, No. 6:21-cv-00863-AA) 2023 | |
| 20 | U.S.Dist.LEXIS 18798, at *7..... | 19 |
| 21 | Statutes | |
| 22 | 11 U.S.C. § 102(1) | 21 |
| 23 | 11 U.S.C. § 502(b) | 18 |
| 24 | 11 U.S.C. § 503(b)(1) | 21 |
| 25 | 11 U.S.C. § 503(b)(1)(A)..... | 20 |
| 26 | 11 U.S.C. § 503(b)(9) | 19 |
| 27 | 11 U.S.C. § 507(a)(1)..... | 21 |
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| 1 | 11 U.S.C. §503(b)(9) | 20 |
| 2 | Fed. R. Bankr. P. 3001(f)..... | 18 |
| 3 | Rules | |
| 4 | LBR 3007-1(c)(1); | 18 |
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1 Richard A. Marshack, in his capacity as Chapter 11 Trustee (“Trustee”) of the Litigation
2 Practice Group P.C. (“Debtor”) in the above-captioned bankruptcy case (“Bankruptcy Case”),
3 hereby files this omnibus objection to certain proofs of claim which were improperly designated as
4 an administrative claim as identified in **Exhibit A** attached hereto (“Objected Claims”).³ The Trustee
5 brings this Objection, pursuant to §§ 105(a) and 502 of title 11 of the United States Code
6 (“Bankruptcy Code”), Rules 3007(d), 3001(d), and 3018 of the Federal Rules of Bankruptcy
7 Procedure (“Bankruptcy Rules”) and Rule 3007-1 of the Local Rules of Bankruptcy Practice and
8 Procedure of the United States Bankruptcy Court for the Central District of California (“Local
9 Rules”). In support of the Objection, the Trustee respectfully states as follows:

10 **1. Argument Summary**

11 This objection groups together claimants (“Alleged Admin Claimants”) who asserted in a
12 Proof of Claim (“POC”) that they are entitled to administrative priority status under 11 U.S.C.
13 §503(b)(9) or as a broader administrative claim under 11 U.S.C. §503(b).⁴

14 Section 503(b)(9) provides an administrative claim for “the value of goods received by the
15 debtor within 20 days **before** the date of the commencement of a case under this title in which the
16 goods have been sold to the debtor in the ordinary course of such debtor’s business.” 11 U.S.C.
17 § 503(b)(9) (emphasis added). Here, review of the Objected Claims shows that all but four of the
18 Alleged Admin Claimants checked the 503(b)(9) box improperly. The Alleged Admin Claimants
19 that checked the § 503(b)(9) on their respective POC appear to be former legal services customers of
20 the Debtor and did not provide any goods to the Debtor before the commencement of this case.
21 These appear to be mistaken and improper designations and the Trustee objects to treatment of
22 Objected Claims as administrative expenses. The Trustee, however, does not seek to disallow the
23 claims in their entirety. Instead, the Trustee requests that the claims be reclassified as general
24 unsecured claims.

25
26
27 ³ Unless otherwise set forth, all references to “§” or “Section” are to a section of the Bankruptcy
Code.

28 ⁴ Several of the claims checked the priority box and added in the “other” priority box a priority claim
under 507(d)(2), which includes any claim under 503(b) (i.e., an administrative claim).

1 The Alleged Admin Claimants also neither filed a motion by the Admin Claims Bar Date
2 seeking allowance of an administrative priority claim nor did they provide evidence showing that the
3 debt asserted to be an administrative expense (a) arose post-petition; (b) arose from a transaction
4 with the Debtor; and (c) directly and substantially benefitted the Debtor's estate. Therefore, the
5 burden of proof for allowance of administrative expense is not met by any of the Alleged Admin
6 Claimants. The Objected Claims should be disallowed as administrative claims.

7 **2. Factual Background**

8 **A. General Background**

9 On March 20, 2023 ("Petition Date"), the Debtor filed a voluntary petition under chapter
10 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Central District of
11 California ("Court"), commencing the Bankruptcy Case.

12 On May 8, 2023, the Court entered an order ("Trustee Appointment Order") [Docket No. 65]
13 granting a motion [Docket No. 21] filed by the Office of the United States Trustee ("UST"), which
14 requested the appointment of a chapter 11 trustee. [Docket No. 21]. Richard A. Marshack was
15 appointed as the chapter 11 trustee pursuant to the Trustee Appointment Order and continues to
16 serve in that capacity.

17 On June 23, 2023, the Office of the United States Trustee appointed the Official Committee
18 of Unsecured Creditors ("Committee") [Docket No. 134], which was amended to increase the
19 number of Committee members on June 29, 2023 [Docket No. 157].

20 On December 22, 2023, the Court entered an order [Docket No. 785] approving the
21 employment of Omni Agent Solutions ("Omni") as the noticing and claims agent in this Bankruptcy
22 Case.

23 **B. Facts Relevant to This Objection**

24 **i. The Bar Dates**

25 On October 16, 2023, the Court entered an Order setting the Administrative Claims Bar Date
26 as November 21, 2023 ("Administrative Claims Bar Date Order"). *See* Dk. No. 577. The
27 Administrative Claims Bar Date Order provided that the deadline for the filing of any motion to
28 obtain an allowed administrative claim arising at any time from the March 20, 2023, petition date,

1 through and including the August 4, 2023, was November 21, 2023 (“Administrative Claims Bar
2 Date”). *Id.*

3 On January 2, 2024, the Court entered an order [Docket No. 804] (“Bar Date Order”)
4 establishing February 23, 2024, at 4:00 p.m. (prevailing Pacific Time) as the deadline to file claims
5 for all persons and entities, including governmental units (as that term is defined in § 101(27)),
6 holding secured, unsecured priority, or unsecured non-priority claims against the Debtor arising (or
7 deemed to arise) before the Petition Date. The Bankruptcy Court further established a Rejection Bar
8 Date and a Chapter 5 Bar Date (as those terms are defined in the GUC Bar Date Order).

9 On February 23, 2024, the Bankruptcy Court entered an order [Docket No. 963] establishing
10 two modified general bar dates: (i) February 25, 2024, at 4:00 p.m. prevailing Pacific Time, as the
11 deadline for certain consumer clients, holding a General Claim, that were provided notice of the bar
12 dates in the GUC Bar Date Order on January 24, 2024, or January 25, 2024; and (ii) March 25, 2024,
13 at 4:00 p.m. prevailing Pacific Time for certain consumer clients, holding a General Claim, to which
14 the Trustee was unable to provide email notice.

15 Accordingly, as of the filing of this Objection, the bar dates have passed with respect to all
16 holders of claims.

17 **ii. The Plan and Confirmation Timeline**

18 On June 17, 2024, the Court entered an order [Docket No. 1348] (“Disclosure Statement
19 Order”) approving the solicitation of a disclosure statement [Docket No. 1345] describing the plan of
20 liquidation jointly proposed by the Trustee and the Committee (as may be amended, modified, or
21 supplemented from time to time, the “Plan”). The Disclosure Statement Order established certain
22 deadlines concerning confirmation of the plan. *See* Docket No. 1348. Among other things, the Court
23 established June 19, 2024, as the deadline to object to claims for voting purposes. *See id.*

24 On August 29, 2024, the Court conducted a hearing to consider confirmation of the Modified
25 First Amended Joint Chapter 11 Plan of Liquidation (Dated June 14, 2024) [Docket No. 1344] and
26 confirmed the same at the hearing and later entered the Order of Confirmation on September 9, 2024
27 [Docket No. 1646]. The Effective Date has not occurred as of the time of this filing.

1 **iii. The Objected Claims**

2 None of the Alleged Admin Claimants in the following table filed a motion with this Court.
3 66 POCs were filed with Omni; the remaining four were filed with the Court. Pursuant to LBR 3007-
4 1(a)(4), attached to the declaration of Alina Mamlyuk are the true and accurate copies of the POCs
5 which are exhibits supporting each claim objection. The “Evidence” section of the table summarizes
6 what has been indicated on the POC by the Alleged Admin Claimant which causes the Trustee to
7 assert that the administrative claim designation is improper. The majority of the Objected Claims
8 appear to be filed by former customers of the Debtor because they have some indication that the
9 claim is based on services that LPG was to have provided; most include bank statements or list of
10 payments made to LPG or copies of the LPG Legal Services Agreement.

11 Unless indicated otherwise, all Objected Claims were filed past the Administrative Claims
12 Bar Date.

| 14 CLAIMANT | 15 CLAIM# | 16 FILE CLASS | 17 AMOUNT | 18 DATE FILED/ 19 EVIDENCE |
|------------------|--------------------------|---------------------|---------------|--|
| 20 Angel Rivera | 21 C 571- 22 2113.1 | 23 ADM | 24 \$1,600.00 | 25 11/21/23; Checked box showing that §507(a)(2) applies, and wrote “Hired with LPG. \$20.00 an hour. Not compensated for services. Not compensated for hours worked.” However, Alleged Admin Claimant did not file a motion for an administrative expense and did not indicate whether the debt arose from a postpetition transaction with the Debtor which directly and substantially benefitted the estate. |
| 26 Anita J Green | 27 C 571- 28 101829.1 | 503(b)(9)- MULTI | \$2,198.52 | 2-20-24; Wrote “Money paid for services not rendered,” indicating former customer status. |

| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|-------------------|----------------|-----------------|-------------------------------|--|
| 1 | Anita L Coots | C 571-101228.1 | 503(b)(9)-MULTI | \$3,640.27 | 2-13-24; Attached copies of bank statements with payments made to LPG, indicating former customer status. |
| 2 | Anthony Stredick | C 571-100314.1 | 503(b)(9) | \$4,285.40 | 2-1-24; Wrote "Theft of Service" and attached copies of bank statements with payments made to LPG, indicating former customer status. |
| 3 | Borhane Kaouache | C 571-102190.1 | 503(b)(9) | \$14,000.00 | 2-22-24; Attached copies of bank statements with payments made to LPG, indicating former customer status. |
| 4 | Brinder Marshall | C 571-100618.1 | 503(b)(9)-MULTI | Various amounts listed in POC | 2-5-24; Wrote "credit cards" and attached a list of payments made to LPG, indicating former customer status. |
| 5 | Carlos Bacsal | C 571-100717.1 | 503(b)(9) | \$22,877.40 | 2-6-24; Wrote "Services not performed per legal agreement" and attached a list of payments made to LPG, indicating former customer status. |
| 6 | Carrie McLaughlin | C 571-100744.1 | 503(b)(9) | \$3,967.32 | 2-10-24; Wrote "I paid them + LPG did not do one thing to help me" and attached copies of bank statements with payments made to LPG, indicating former customer status. |
| 7 | Catrice Williams | C 571-964.1 | ADM | \$3,216.00 | 9-24-23; Wrote "loan" as basis for claim. However, Alleged Admin Claimant did not file a motion for an administrative expense and did not indicate whether the debt arose from a postpetition transaction with the |
| 8 | | | | | |

| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|----------------------|----------------|-----------------|-------------|--|
| 1 | | | | | Debtor which directly and substantially benefitted the estate. |
| 2 | Celerina Mendez Cruz | C 571-101488.1 | 503(b)(9) | \$5,000.00 | 2-22-2024; Attached copies of bank statements with payments made to LPG, indicating former customer status. |
| 3 | Cheryl Harris | C 571-101977.1 | 503(b)(9) | \$5,949.60 | 2-22-24; Wrote "I hired LPG to consolidate and they never paid out" and attached a list of payments made to LPG, indicating former customer status. |
| 4 | Chris & Kelly Behnke | C 571-100280.2 | 503(b)(9)-MULTI | \$10,103.87 | 1-31-24; Wrote "Services Performed" and attached copies of credit reports and emails from "Coast Processing Team with Litigation Practice Group," indicating former customer status. |
| 5 | Constance Plummer | C 571-100564.1 | 503(b)(9) | \$7,120.51 | 2-6-24; Attached copies of bank statements with payments made to LPG, indicating former customer status. |
| 6 | Corissa Hammers | C 571-101438.1 | 503(b)(9) | \$4,699.00 | 2-20-24; Wrote "Services not received," indicating former customer status. |
| 7 | Cynthia Clifford | C 571-101060.1 | 503(b)(9)-MULTI | \$8,349.33 | 2-14-24; Wrote "Promised to clear credit debts + nothing was cleared" and attached a list of payments made to LPG, indicating former customer status. |
| 8 | David B Waltz | C 571-101215.1 | 503(b)(9) | \$10,000.00 | 2-12-24; Wrote "services" and attached a copy of a document showing The Litigation Practice Group as "Retail |

| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|----|--------------------|----------------|------------|--------------|---|
| 1 | | | | | Seller/Merchant," indicating former customer status. |
| 2 | Deborah Bonelli | C 571-100327.1 | 503(b)(9) | \$6,032.20 | 2-1-24; Wrote "Payment – no debt was erased" and attached copy of agreement with Gallant Law Group, indicating former customer status. |
| 3 | Dennis E Theriault | C 571-101748.1 | 503(b)(9) | \$3,600.00 | 7-6-23 (timely); Wrote "Violation of FTC Sales Rules; fraudulent misrepresentation of services to be performed / executed" and attached a list of payments made to LPG as well as a copy of LPG Legal Services Agreement, indicating former customer status. |
| 4 | Diana J Dalessio | C 571-101073.1 | 503(b)(9) | \$16,560.21 | 2-15-24; Wrote "Services paid for + not performed by LPG" and attached handwritten letter indicating former customer status. |
| 5 | Douglas Stiele | C 571-117.1 | ADM | \$307,280.00 | 7-17-23; Wrote "Litigation and Representation Services Performed for clients of LPG" and attached a list of LPG File Numbers with Flat Fee Service Amount of \$2,500 per file as well as a copy of a lease without an explanation of the attachment. Alleged Admin Claimant ("Mr. Stiele") did not file a motion for an administrative expense and did not indicate whether the debt arose from a postpetition transaction with the |
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| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|----|------------------------------|----------------|-----------------|-------------|--|
| 1 | | | | | Debtor which directly and substantially benefitted the estate. Further, Mr. Stiele filed another claim, POC 97, that attached an employment contract dated 12/24/21 between LPG and Mr. Stiele at a rate of \$144,000.00 per year. There is no explanation included in POC 117 for the alleged \$2,500 flat fee per LPG file. |
| 2 | Gerson David Cortes Membreno | C 571-102214.1 | 503(b)(9)-MULTI | \$3,181.90 | 2-23-24; Wrote "Credits Cards Consolidation," indicating former customer status. |
| 3 | Giorgio Giardinella | C 571-101030.1 | 503(b)(9)-MULTI | \$11,241.42 | 2-15-24; Attached a copy of a signed Legal Services Agreement with LPG, indicating former customer status. |
| 4 | Gustavo Romani | C 571-101933.1 | 503(b)(9)-MULTI | \$10,000.00 | 2-23-24; Wrote "Service performed" and attached a copy of a signed Legal Services Agreement with LPG, indicating former customer status. |
| 5 | Haley Simmoneau | C 571-106.3 | ADM | \$65,000.00 | 1/18/24; Wrote that basis for claim is "Services performed after filing and before sale. Includes out of pocket rent for 2 months and appearance fees." Alleged Admin Claimant ("Ms. Simmoneau") did not file a motion for an administrative expense that would indicate whether basis for the claim is debt that arose from a postpetition transaction with the |
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| 1 | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|------------------------|----------------|-----------------|-------------|---|
| 2 | | | | | Debtor which directly and substantially benefitted the estate. Further, Trustee's counsel Alina Mamlyuk spoke to Ms. Simmoneau on the phone on May 31, 2024 and sent emails on June 3, 2024 and June 5, 2024 seeking to confirm alleged facts communicated over the phone but Ms. Simmoneau did not respond. Ms. Simmoneau provided a declaration in support of administrative claim of Han Trinh (dk. no. 1124) where she declared she was a Greyson employee post-petition and not LPG's. |
| 3 | Haley Maree Anderson | C 571-101573.1 | 503(b)(9) | \$7,871.75 | 2-23-24; Attached a copy of a signed Legal Services Agreement with LPG and a list of payments made to LPG, indicating former customer status. |
| 4 | Hanna Yager | C 571-101175.1 | 503(b)(9)-MULTI | \$8,622.00 | 2-15-24; Wrote "Payments made for debt relief services not carried out" and attached copies of bank statements (although no LPG payments shown), indicating former customer status. |
| 5 | Heather Silguero | C 571-101006.1 | 503(b)(9) | \$5,000.00 | 2-14-24; Wrote "money/payments I made," indicating former customer status. |
| 6 | Jacqueline Fomby-Lewis | C 571-102658.1 | 503(b)(9) | \$21,543.00 | 2-22-24; Wrote "Debt being removed / payment \$270.91 since 4/16/22 |

| 1 | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|------------------|----------------|------------|-------------|---|
| 2 | | | | | Automatic withdrawals monthly” and attached handwritten letter indicating former customer status as well as a Legal Services Agreement with LPG. |
| 3 | Jason Ryer | C 571-101272.1 | 503(b)(9) | \$9,540.00 | 2-18-24; No description of the claim or evidence was attached. Nothing indicates 503(b)(9) eligibility as no description of the claim was provided. |
| 4 | Jenifer Pelayan | C 571-102230.1 | 503(b)(9) | \$3,000.25 | 2-23-24; Wrote “credit cards” and attached evidence of payments made to LPG, indicating former customer status. |
| 5 | Jo Lynn Urlacher | C 571-100021.1 | 503(b)(9) | \$8,370.42 | 1-23-24; Wrote “Services performed” and did not attach any additional evidence. Nothing indicates 503(b)(9) eligibility as a vendor for goods being delivered to LPG. Most likely, this is a POC of a former customer but not enough evidence to be conclusive. |
| 6 | Joseph C Takas | C 571-101969.1 | 503(b)(9) | \$6,648.38 | 2-22-24; Wrote “Services paid for, but never received,” and attached a handwritten note indicating former customer status, copies of payments made to LPG, as well as a copy of a Legal Services Agreement with LPG. |
| 7 | Joshua Miles | C 571-100175.1 | 503(b)(9) | \$20,425.04 | 1-29-24; Wrote “Pay off credit cards” and attached a copy of payments made as well as addendum to Legal |
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| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|----|-------------------|----------------|-----------------|---|--|
| 1 | | | | | Services Agreement with LPS, indicating former customer status. |
| 2 | Julibelle Quintos | C 571-101387.1 | 503(b)(9) | \$4,341.46 | 2-19-24; Wrote "LPG, PNX, MLG services not performed is; Wells Fargo Discover credit cards debt consolidation," indicating former customer status. |
| 3 | Kermic P Basat Jr | C 571-102205.1 | 503(b)(9) | \$2,367.19 | 2-23-24; Wrote "Services Not Performed" and "Cash paid to LPG," indicating former customer status. |
| 4 | Kevin Kurka | C 571-101651.1 | 503(b)(9)-MULTI | \$7,890.00 | 2-23-24; Wrote "Wages, services performed, Motor Vehicle" and includes a list of requested documents from LPG but makes no indication of status as a vendor or describes any goods delivered to the Debtor within 20 days before Petition Date. |
| 5 | Keysha Everage | C 571-100496.1 | 503(b)(9)-MULTI | No amount is listed under 503(b)(9) although total POC is in the amount of \$5,581.63 | 2-5-24; Wrote "money paid to company for a service after a few years / never completed" and included copies of bank statements showing payments made to LPG, indicating former customer status. |
| 6 | Kimberly O'Brien | C 571-100578.1 | 503(b)(9) | \$11,147.52 | 2-6-24; Attached a letter stating "I am a victim of the LPG fraud case and enclosed are all copies of the discover [sic] bill they were supposed to be paying [...] with some of the 48 payments shown to LPG Law," indicating former customer status. |
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| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|--|----------------|-----------------|--|---|
| 1 | Kirsten Campbell | C 571-100191.1 | 503(b)(9)-MULTI | \$6,118.00 | 1-29-24; Wrote "Debtor collected money to pay student loan settlement" and attached copies of Legal Services Agreement with Beling & Associates, indicating former customer status. |
| 2 | Leah Bender; "Other names the creditor used with the debtor: Leah Sweeney" | C 571-100279.1 | 503(b)(9)-MULTI | No amount is listed under 503(b)(9) although total POC is in the amount of \$25,000.00 | 1-30-24; Wrote "services performed" and attached copies of correspondence with LPG as well as list of payments made to LPG, indicating former customer status. |
| 3 | Leann Watson Morales | C 571-100635.1 | 503(b)(9) | \$5,828.18 | 2-13-24; Wrote "LPG law did not complete service they were hired to do" and attached a list of payments made to LPG law, indicating former customer status. |
| 4 | Leda Manookian | C 571-100301.1 | 503(b)(9)-MULTI | \$6,281.55 | 1-31-24; Attached a copy of bank statements showing payments made to LPG as well as a copy of instructions to prior clients of LPG, indicating former customer status. |
| 5 | Lilua Del Rosso | C 571-100945.1 | 503(b)(9)-MULTI | \$5,956.80 | 2-9-24; Wrote "Services Not Performed" and a list of payments from Morning Law Group stating this was a "detailed payment history," indicating former customer status. |
| 6 | Lisa Johnson | C 571-100344.1 | 503(b)(9)-MULTI | No amount is listed under 503(b)(9) although total POC is | 2-2-24; Wrote "Services performed / promises were not fulfilled. Would like refund" and attached a copy of instructions to prior |

| 1 | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|----------------------|----------------|-----------------|---|---|
| 2 | | | | in the amount of \$1,952.23 | clients of LPG as well as introductory onboarding email from LPG, indicating former customer status. |
| 3 | Lois Ruble | C 571-100521.1 | 503(b)(9) | \$3,330.36 | 2-5-24; Wrote "Credit Card debt solutions and attached copies of bank statements showing payments made to LPG, indicating former customer status. |
| 4 | Luz Benavides | C 571-102188.1 | 503(b)(9)-MULTI | \$2,558.80 | 2-22-24; Wrote "The Litigation Practice Group P.C. filed bankruptcy and never rendered services paid by Luz Benavides" and attached a copy of a Legal Services Agreement with LPG along with a list of payments, indicating former customer status. |
| 5 | Lynda Denette Wilcox | C 571-101035.1 | 503(b)(9)-MULTI | \$6,187.77 | 2-17-24; Wrote "Services Performed" and attached a copy of a Legal Services Agreement with LPG along with a list of payments, indicating former customer status. |
| 6 | Maria Zilinskas | C 571-100215.1 | 503(b)(9) | \$11,807.00 | 1-31-24; Wrote "Wells Fargo debt bank" and attached a copy of a Legal Services Agreement with LPG along with a list of payments, indicating former customer status. |
| 7 | Martin Grams-Stant | C 571-101928.1 | 503(b)(9)-MULTI | No amount is listed under 503(b)(9) although total POC is | 2-23-24; Wrote "service pad for, that weren't performed," indicating former customer status. |

| 1 | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|--------------------------------------|----------------|-----------------|-----------------------------|--|
| 2 | | | | in the amount of \$6,000.00 | |
| 3 | Marvin Gale & Sara Denise Ray | C 571-100644.1 | 503(b)(9) | \$13,580.28 | 2-7-24; Wrote "services performed / credit card" and attached a letter and bank statements showing payments made to LPG, indicating former customer status. |
| 4 | Nabil Ahmed Sarsour | C 571-101423.1 | 503(b)(9)-MULTI | \$9,783.00 | 2-20-24; Did not describe the basis of the claim in POC but attached but attached bank statements showing payments made to "Coast Processing," indicating former customer status. |
| 5 | Nationwide Appearance Attorneys, LLC | C 571-101660.1 | 503(b)(9)-MULTI | \$3,400.00 | 2-23-24; Wrote "Attorney appearance services provided. Requested by individual location." The 503(b)(9) amount is identified as \$3,400 which is calculated as \$1,525 pre filing and \$1,875 post filing. Also attached are invoices that indicate appearances made. All of the invoices are for services rendered and none are for delivered goods. Motion for administrative expense has not been filed and filing of the POC is past Administrative Claims Bar Date. |
| 6 | Paulo A Cuellar | C 571-101604.1 | 503(b)(9) | \$5,132.85 | 2-20-24; Wrote "promised to pay 6 debts if I paid LPG \$342.19 per month," indicating former customer status. |

| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|--------------------|----------------|-----------------|---|---|
| 1 | Rebecca Burgett | C 571-101678.1 | 503(b)(9) | \$3,600.00 | 2-21-24; Wrote "They took my money paid nothing to help with my debt," indicating former customer status. |
| 2 | Robert Allen | C 571-102237.1 | 503(b)(9) | \$10,000.00 | 2-23-24; Wrote "goods sold" but did not provide evidence showing any sale of goods. Instead, attached copies of bank statements and an email from Redwood Processing dated April 8, 2022, indicating that customer file was "now being serviced by a law firm, LPG, with licensed counsel in every state," indicating former customer status. |
| 3 | Russell Richardson | C 571-101159.1 | 503(b)(9)-MULTI | No amount is listed under 503(b)(9) although total POC is in the amount of \$6,146.39 | 2-15-24; Wrote "Malpractice. Didn't provide services promised" and no additional documentation was attached. Description of "malpractice" indicated former customer status. |
| 4 | Rustam Nazarov | C 571-102310.1 | 503(b)(9) | \$3,328.00 | 2-23-24; Wrote "attached documents – service legal" and attached bank statements showing payments made to LPG, indicating former customer status. |
| 5 | Sarah Adleman | C 571-100313.1 | 503(b)(9)-MULTI | \$10,723.50 | 2-1-24; Wrote "20 payments of \$357.45 for promised legal services" and attached copies of bank statements showing payments to Coast Processing, indicating former customer status. |

| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|-------------------------|----------------|-----------------|-------------|--|
| 1 | Scott Folda | C 571-100478.1 | 503(b)(9) | \$23,318.51 | 2-5-24; Wrote "I paid for services never received" and attached a list of payments made to LPG, indicating former customer status. |
| 2 | Shalise Dewitt | C 571-101055.1 | 503(b)(9)-MULTI | \$3,574.56 | 2-13-24; Wrote "debtor took money from my account to help resolve my debt but failed to do so," indicating former customer status. |
| 3 | Stephanie Ann Ingram | C 571-100872.1 | 503(b)(9) | \$5,000.00 | 2-12-24; Wrote "They took money out of my account to pay my bill but they didn't," and attached handwritten note and copies of payments made, indicating former customer status. |
| 4 | Stephanie Kay Albertson | C 571-101009.1 | 503(b)(9)-MULTI | \$16,668.00 | 2-14-24; Wrote "Debt consolidation services" and attached an email onboarding to LPG, indicating former customer status. |
| 5 | Stephanie Sciacca | C 571-100476.1 | 503(b)(9) | \$1,918.50 | 2-5-24; Wrote "LPG took payments and did nothing about reducing payments of creditors," indicating former customer status. |
| 6 | Stephanie Walker | C 571-102009.1 | 503(b)(9)-MULTI | \$2,669.69 | 2-22-24; Wrote "Services promised" and included a copy of a Legal Services Agreement with LPG, indicating former customer status. |
| 7 | Stephanie Winters | C 571-100939.1 | 503(b)(9) | \$6,392.04 | 2-14-24; Wrote "breach of contract. Contracted services not performed" and attached a copy of Legal Services Agreement with LPG |

| | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|-------------------|----------------|-----------------|---|--|
| 1 | | | | | and a list of payments made, indicating former customer status. |
| 2 | Sydney L Smith | C 571-100090.1 | 503(b)(9)-MULTI | No amount is listed under 503(b)(9) although total POC is in the amount of \$3,394.08 | 1-25-24; Wrote "Took money every month for debt resolution and none were resolved," indicating former customer status. |
| 3 | Teresa Booker | C 571-100554.1 | 503(b)(9) | \$10,711.40 | 2-10-24; Wrote "Payments received by LPG Credit Card Consolidations and attached a copy of Legal Services Agreement with LPG and a list of payments made, indicating former customer status. |
| 4 | Valerie S Furlow | C 571-101749.1 | 503(b)(9) | \$16,706.41 | 2-21-24; Wrote "Services not performed + promises that were not kept" and attached a copy of an addendum to a Legal Services Agreement with LPG, a list of payments made, and copies of e-mails with LPG's counsel Richard Meier, indicating former customer status. |
| 5 | Vernetta A Dotson | C 571-101871.1 | 503(b)(9) | \$4,600.00 | 2-22-24; Wrote "performed services" and included copy of email reporting LPG to a local Better Business Bureau, a copy of an addendum to a Legal Services Agreement with LPG, a list of payments made, and copy of enrollment e-mail with |

| 1 | CLAIMANT | CLAIM# | FILE CLASS | AMOUNT | DATE FILED/EVIDENCE |
|---|-------------------|----------------|------------|------------|--|
| 2 | | | | | LPG, indicating former customer status. |
| 3 | Victoria L Harris | C 571-100456.1 | 503(b)(9) | \$3,996.00 | 2-5-24; Wrote "Debt Relief Program," indicating former customer status |

6 True and correct copies of the Objected Claims are attached to the RJN as **Exhibits 1-70**.

7 **3. Legal Argument**

8 **A. Objecting Party's Burden**

9 A proof of claim executed and filed in accordance with Rule 3001 of the Federal Rules of
10 Bankruptcy Procedure ("FRBP") constitutes *prima facie* evidence of the validity and amount of the
11 claim. Fed. R. Bankr. P. 3001(f). The proof of claim is deemed allowed "unless a party in interest"
12 objects. 11 U.S.C. §502(a). "[I]f such objection to a claim is made, the court, after notice and a
13 hearing, shall determine the amount of such claim in lawful currency of the United States as of the
14 date of the filing of the petition, and shall allow such claim in such amount[.]" 11 U.S.C. § 502(b).

15 It is an objecting party's burden to submit sufficient evidence to overcome the presumption
16 of the validity of the proof of claim executed and filed in accordance with FRBP 3001. Loc. Bankr.
17 R. 3007-1(c)(1); *In re Lundell*, 223 F.3d 1035, 1039 (9th Cir. 2000). The objecting party is not
18 required to disprove the claim. *In re Kahn*, 114 B.R. 40 (Bankr. S.D.N.Y. 1990). The objecting party
19 only has the initial burden of producing facts sufficient to demonstrate that an actual dispute
20 regarding the validity or amount of the claim exists. *In re Hydorn*, 94 B.R. 608 (Bankr. W.D. Mo.
21 1988). If the objecting party provides sufficient evidence to negate one or more of the sworn facts in
22 the proof of claim, then the burden reverts back to the claimant to prove the validity by a
23 preponderance of the evidence. *In re Lundell*, 233 F.3d at 1039. The ultimate burden of persuasion
24 remains at all times with the claimant. *Id.*; *In re Holmes*, 931 F.2d 620 (9th Cir. 1991).

25 **B. Standard for Allowance of Claims Pursuant to 11 U.S.C. §503(b)(9)**

26 "The burden of proving an administrative expense claim is on the claimant." *Microsoft Corp.*
27 v. *DAK Industries* (*In re DAK Industries*), 66 F.3d 1091, 1094 (9th Cir. 1995). An administrative
28 claim may be allowed for "the value of any goods received by the debtor within 20 days before the

1 date of commencement of a [bankruptcy case] in which the goods have been sold to the debtor in the
2 ordinary course of business." 11 U.S.C. §503(b)(9). "By the plain terms of the statute, a vendor's
3 right to assert an administrative claim is limited in only three ways: (1) the vendor must have
4 provided goods (not services); (2) the debtor must have received the goods within twenty-one days
5 of the commencement of the case; and (3) the goods must have been sold 'in the ordinary course of
6 the debtor's business.'" *Brown & Cole Stores, LLC v. Associated Grocers, Inc. (In re Brown & Cole*
7 *Stores, LLC)*, 375 B.R. 873, 878 n. 7 (B.A.P. 9th Cir. 2007). Furthermore, "the proper definition of
8 'goods,' which is not defined in the statute, is derived from the Uniform Commercial Code ("UCC").
9 [...] This definition encompasses all things 'which are movable at the time of identification to the
10 contract for sale.' [...] (quoting U.C.C. § 2-105(1))." *PacifiCorp v. N. Pac. Canners & Packers, Inc.*
11 (D.Or. Feb. 3, 2023, No. 6:21-cv-00863-AA) 2023 U.S.Dist.LEXIS 18798, at *7.

12 As shown in the Evidence section of the table in this Objection, the Alleged Admin
13 Claimants here neither assert that they are a vendor nor that they provided any goods to the Debtor
14 before the commencement of this case. Instead, the individual POCs contain evidence indicating that
15 the majority of them were former customers of LPG. The Alleged Admin Claimants who checked
16 the §503(b)(9) box largely provided lists of payments made to LPG, bank statements showing those
17 payments, some form a Legal Services Agreement with LPG, communication like onboarding emails
18 or, alternatively, included language that can be interpreted to indicate their former customer status.
19 Not one of the Objected Claims included an invoice for goods, proof of delivery of goods or a
20 contract that would indicate any sort of a vendor relationship with the Debtor. Some POCs included
21 language indicating confusion or lack of clarity about questions of the POC form; arguably, the
22 Objected Claims have the §503(b)(9) box marked as a mistake.

23 The 64 Objected Claims which appear to indicate that they are filed by former consumer
24 clients of LPG all seek reimbursement of the monthly payments that were electronically debited
25 from their respective bank accounts. Unfortunately, based on the facts of this bankruptcy, there are
26 thousands of former LPG customer who are general unsecured claimants. These general unsecured
27 claimants filled out and filed POCs but they did not check the §503(b)(9) box since it does not apply.
28 In the interest of fairness, simply checking the §503(b)(9) box does not qualify Alleged Admin

1 Claimants for the priority standing in front of other former LPG customer claimants with general
2 unsecured claims who have analogous factual basis for their claims. There is no evidence supporting
3 true §503(b)(9) status in any of the Objected Claims here. Since the burden of proof lies on Alleged
4 Admin Claimants as the administrative claimants seeking allowance of an administrative expense,
5 they have failed to meet their burden under 11 U.S.C. §503(b)(9).

6 **C. Standard for Allowance Under 11 U.S.C §503(b)**

7 Despite the Alleged Admin Claimants' failure to allege facts sufficient to satisfy the elements
8 of Section 503(b)(9), Trustee investigated whether the facts alleged could be pertinent to any other
9 subsections of Section 503(b). Claims for "the actual, necessary costs and expenses of preserving the
10 estate, including wages, salaries, or commissions for services rendered after the commencement of
11 the case" may be entitled to administrative priority. 11 U.S.C. § 503(b)(1)(A); *see Abercrombie v.*
12 *Hayden Corp. (In re Abercrombie)*, 139 F.3d 755, 756 (9th Cir. 1998). "To be deemed an
13 administrative expense, the claim must have arisen from a transaction with the debtor in possession,
14 and directly and substantially benefited the estate." *Boeing North America, Inc. v. Ybarra (In re*
15 *Ybarra)*, 424 F.3d 1018, 1025 (9th Cir. 2005). "In order to keep administrative costs to the estate at a
16 minimum, 'the actual, necessary costs and expenses of preserving the estate...' are construed
17 narrowly." *DAK Industries*, 66 F.3d at 1094. A claimant seeking administrative expense treatment
18 must show that the debt asserted to be an administrative expense: (a) arose postpetition; "[b]" arose
19 from a transaction with the debtor-in-possession as opposed to the preceding entity (or alternatively,
20 that the claimant gave consideration to the debtor-in-possession); and [c] directly and substantially
21 benefitted the estate." *Id.*

22 Furthermore, any claimant seeking an allowed administrative expense must file a motion
23 with the bankruptcy court because an administrative expense will only be allowed after a motion and
24 a hearing. Simply filing a POC does not satisfy the requirements of Section 503(b). With respect to
25 the first prerequisite, if a creditor is seeking an administrative claim, the request for payment should
26 not be labeled in a "proof of claim," because it is not properly asserted in a proof of claim. *NL Indus.*
27 *v. GHR Energy Corp.*, 940 F.2d 957 (5th Cir. 1991); *In re Richfield Equities, L.L.C.*, 556 B.R. 313,
28 318 (Bankr. E.D. Mich. 2016). In fact, the official bankruptcy proof of claim form specifies at the

1 top in bold face: “**Do not use this form to make a request for payment of an administrative**
2 **expense. Make such a request according to 11 U.S.C. § 503.**” *See*, Official Bankruptcy Form 410.
3 Indeed, an administrative claim cannot be allowed or paid pursuant to a proof of claim. Rather the
4 only procedure would be for a claimant seeking an administrative claim to file a motion for
5 allowance of administrative claim.

6 Specifically, Section 503(b)(1) defines administrative expenses, and enumerates six specific
7 types of claims that qualify for first priority. *Id.* Section 503(b) provides that administrative expenses
8 “shall be allowed,” but only “[a]fter notice and a hearing . . .”

9 Section 503(b)’s plain language appears to establish conclusively that “notice and a hearing”
10 are required before payment of an administrative expense.⁵ *See, Dreyfuss v. Cory (In re Cloobeck),*
11 788 F.3d 1243 (9th Cir. 2015) (holding the Trustee could pay an estate’s administrative expense in
12 the form of income tax liability, after notice and a hearing.) This is because “[i]n classifying the
13 order of payment for creditors’ claims, the Bankruptcy Code affords the highest level of priority to
14 claims denominated ‘administrative expenses.’” *Abercrombie v. Hayden Corp. (In re Abercrombie),*
15 139 F.3d 755, 756 (9th Cir. 1998) (citing 11 U.S.C. § 507(a)(1)). Indeed, “[a]dministrative priority
16 claims under 11 U.S.C.S. § 503(b)(1)(A) are held to a stricter standard. Because they must be
17 presented to a court by motion, they are not deemed allowed as priority claims.” *Boruff v. Cook Inlet*
18 *Energy LLC (In re Cook Inlet Energy LLC)*, 583 B.R. 494, 496 (B.A.P. 9th Cir. 2018)

19 Here, none of the Alleged Admin Claimants filed a motion with the Court for an allowance
20 of an administrative expense and nearly all claimants filed the POCs past the Administrative Claims
21 Bar Date. None have been noticed and none are set for a hearing other than the hearing scheduled for
22 this Objection. Despite this, the Trustee investigated each of the Objected Claims by thoroughly
23 reading every POC and analyzing the attachments; none provide evidence of postpetition
24 transactions with the Debtor which directly and substantially benefitted the estate. These Objected
25

26 ⁵ The statutory phrase “after notice and a hearing” is a term of art in the Bankruptcy Code meaning “after
27 such notice as is appropriate in the particular circumstances, and such opportunity for a hearing as is
28 appropriate in the particular circumstances.” *See* 11 U.S.C. § 102(1). The phrase “authorizes an act without an
actual hearing if such notice is given properly and if—(i) such a hearing is not requested timely by a party in
interest; or (ii) there is insufficient time for a hearing to be commenced before such act must be done, and the
court authorizes such act . . .” *Id.* § 102(1)(B).

1 Claims are improperly designated as administrative expenses. Because of the similarities in the
2 POCs and similarities in the legal argument, the Trustee has chosen to make the Objection an
3 omnibus one so as to reduce potential legal costs and expenses of having to file individual objections
4 and to preserve estate resources.

5 In addition to the Alleged Admin Claimants that improperly asserted § 503(b)(9) claims,
6 there are four claims that assert general 503(b) administrative expense claims—those are the claims
7 of Catrice Williams, Angel Rivera, Douglas Stiele, and Haley Simmoneau. These claims also did not
8 file a motion seeking allowance of their administrative expense claims (or doing so by the
9 Administrative Claims Bar Date) and should be disallowed on that basis alone. The fact that these
10 claimants did not put their alleged administrative claims in a motion for a hearing does not absolve
11 them of the burden of proof and procedural requirements under the Bankruptcy Code.

12 With respect to the evidence (or lack thereof) submitted in connection with these four
13 specific claims, there is no evidence that the alleged claims arose post-petition from a transaction
14 with the Debtor or that the claims directly and substantially benefitted the estate. *DAK Industries*, 66
15 F.3d at 1094. Dates are critical in asserting an administrative expense claim as the transaction must
16 occur after the Petition Date. These four Objected Claims give no indication of the time period for
17 which the expenses are claimed.⁶ The claims of Douglas Stiele and Haley Simmoneau also do not
18 explain the basis for calculation of the claim. Mr. Stiele's claim lists \$2,500 per LPG Customer file
19 that he presumably worked on as an attorney but this does not correlate to the \$144,000 per year
20 salary that is listed in his LPG employment contract dated 12/24/21. See POC No. 97 on Court's
21 Claims Register. Curiously, Mr. Stiele's claim is in the amount of \$307,280.00 which is more than
22 double his LPG salary according to the contract he provided. Considering that the administrative
23 period in this case is roughly four and a half months, Mr. Stiele's claim seems outrageously
24 overinflated according to his own evidence. Again, it is not clear when these LPG customer files

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27 ⁶ Haley Simmoneau's POC states that "all files were audited or negotiated during the period of time
28 before filing of bankruptcy and the sale of LPG to Morning Law Firm" but gives no details past that
statement, which is not supported by a declaration or any other evidence.

1 were worked on. There is no attached declaration by Douglas Stiele or any other explanation of the
2 POC attachments.

3 Likewise, Ms. Simmoneau's claim lists \$500 per "Plaintiff/Petitioner" but also does not
4 explain the basis for this number or provide any agreement with LPG that supports this fee. There is
5 simply no evidence that would document her transaction with the Debtor or be probative about the
6 agreed upon rates. In her declaration attached to Han Trinh's reply to her administrative claim
7 [Docket No. 1124, Simmoneau Declaration, ¶¶ 2, 18-20], Ms. Simmoneau declares that she worked
8 for Greyson Law Center ("Greyson") postpetition. See Docket No. 1124, Simmoneau Declaration,
9 ¶¶ 2, 18-20. Seeking an administrative claim from the Debtor at the same time that Ms. Simmoneau
10 worked for Greystone post-petition rings hollow without substantiating evidence and explanation of
11 that evidence which simply does not exist here. Moreover, in disallowing Greyson's motion for an
12 administrative claim, the Court found that Greyson was formed to "kill" the Debtor. As such,
13 working for a direct competitor does not provide any benefit to the Debtor's estate.

14 The POCs are deficient and they simply do not meet the burden of proof for allowance of an
15 administrative claim. Simply put, none of the Objected Claims qualify as § 503(b) administrative
16 claims and they should not be allowed as such.

17 **4. Conclusion**

18 For the foregoing reasons, Trustee respectfully requests that the Court sustaining the
19 Trustee's Objection and disallow the Objected Claims as administrative expense claims.

20
21 DATED: September 20, 2024

MARSHACK HAYS WOOD LLP

22 By: /s/ Aaron E. de Leest

23 D. EDWARD HAYS

24 AARON E. DE LEEST

ALINA MAMLYUK

General Counsel for Chapter 11 Trustee,
Richard A. Marshack

25

26

27

28

REQUEST FOR JUDICIAL NOTICE

Richard A. Marshack, in his capacity as Chapter 11 Trustee (“Trustee”) of the Litigation Practice Group P.C. (the “Debtor”) in the above-captioned bankruptcy case (“Bankruptcy Case”), requests pursuant to Rule 201 of the Federal Rules of Evidence, that this Court take judicial notice of the following:

| EXHIBIT | JUDICIALLY NOTICED DOCUMENTS |
|---------|---|
| 1. | A true and correct copy of Claim No. 2113-1, filed by Angel Rivera on |
| | November 21, 2023. |
| 2. | A true and correct copy of Claim No. 101829-1, filed by Anita J Green on |
| | February 20, 2024. |
| 3. | A true and correct copy of Claim No. 100314-1, filed by Anita L Coots on |
| | February 13, 2024. |
| 4. | A true and correct copy of Claim No. 100314-1, filed by Anthony Stredick on |
| | February 1, 2024. |
| 5. | A true and correct copy of Claim No. 102190-1, filed by Borhane Kaouache |
| | on February 22, 2024. |
| 6. | A true and correct copy of Claim No. 100618-1, filed by Brinder Marshall on |
| | February 5, 2024. |
| 7. | A true and correct copy of Claim No. 100717-1 filed by Carlos Bacsal on |
| | February 6, 2024. |
| 8. | A true and correct copy of Claim No. 100744-1, filed by Carrie McLaughlin |
| | on February 10, 2024. |
| 9. | A true and correct copy of Claim No. 964-1, filed by Catrice Williams on |
| | September 24, 2023. |
| 10. | A true and correct copy of Claim No. 101488-1, filed by Celerina Mendez |
| | Cruz on February 22, 2024. |

| EXHIBIT | JUDICIALLY NOTICED DOCUMENTS |
|---------|--|
| 11. | A true and correct copy of Claim No. 101977-1, filed by Cheryl Harris on February 22, 2024. |
| 12. | A true and correct copy of Claim No. 100280-2, filed by Chris & Kelly Behnke on January 31, 2024. |
| 13. | A true and correct copy of Claim No. 100564-1, filed by Constance Plummer on February 6, 2024. |
| 14. | A true and correct copy of Claim No. 101438-1, filed by Corissa Hammers on February 20, 2024. |
| 15. | A true and correct copy of Claim No. 101060-1, filed by Cynthia Clifford on February 14, 2024. |
| 16. | A true and correct copy of Claim No. 101215-1, filed by David B Waltz on February 12, 2024. |
| 17. | A true and correct copy of Claim No. 100327-1, filed by Deborah Bonelli on February 1, 2024. |
| 18. | A true and correct copy of Claim No. 101748-1, filed by Dennis E Theriault on July 6, 2023. |
| 19. | A true and correct copy of Claim No. 101073-1, filed by Diana J Dalessio on February 15, 2024. |
| 20. | A true and correct copy of Claim No. 117-1, filed by Douglas Stiele on July 17, 2023. |
| 21. | A true and correct copy of Claim No. 102214-1, filed by Gerson David Cortes Membreno on February 23, 2024. |
| 22. | A true and correct copy of Claim No. 101030-1, filed by Giorgio Giardinella on February 15, 2024. |
| 23. | A true and correct copy of Claim No. 101933-1, filed by Gustavo Romani on February 23, 2024. |

| EXHIBIT | JUDICIALLY NOTICED DOCUMENTS |
|---------|--|
| 24. | A true and correct copy of Claim No. 70, filed by Haley Simmoneau on January 18, 2024. |
| 25. | A true and correct copy of Claim No. 101573-1, filed by Haley Maree Anderson on February 23, 2024. |
| 26. | A true and correct copy of Claim No. 101175-1, filed by Hanna Yager on February 15, 2024. |
| 27. | A true and correct copy of Claim No. 101006-1, filed by Heather Silguero on February 14, 2024. |
| 28. | A true and correct copy of Claim No. 102658-1, filed by Jacqueline Fomby-Lewis on February 22, 2024. |
| 29. | A true and correct copy of Claim No. 101272-1, filed by Jason Ryer on February 18, 2024. |
| 30. | A true and correct copy of Claim No. 102230-1, filed by Jenifer Pelayan on February 23, 2024. |
| 31. | A true and correct copy of Claim No. 100021-1, filed by Jo Lynn Urlacher on January 23, 2024. |
| 32. | A true and correct copy of Claim No. 101969-1, filed by Joseph C Takas on February 22, 2024. |
| 33. | A true and correct copy of Claim No. 100175-1, filed by Joshua Miles on January 29, 2024. |
| 34. | A true and correct copy of Claim No. 101387-1, filed by Julibelle Quintos on February 19, 2024. |
| 35. | A true and correct copy of Claim No. 102205-1, filed by Kermic P Basat Jr on February 23, 2024. |
| 36. | A true and correct copy of Claim No. 101651-1, filed by Kevin Kurka on February 23, 2024. |

| EXHIBIT | JUDICIALLY NOTICED DOCUMENTS |
|---------|--|
| 37. | A true and correct copy of Claim No. 100496-1, filed by Keysha Everage on February 5, 2024. |
| 38. | A true and correct copy of Claim No. 100578-1, filed by Kimberly O'Brien on February 6, 2024. |
| 39. | A true and correct copy of Claim No. 100191-1, filed by Kirsten Campbell on January 29, 2024. |
| 40. | A true and correct copy of Claim No. 100279-1, filed by Leah Bender on January 30, 2024. |
| 41. | A true and correct copy of Claim No. 100635-1, filed by Leann Watson Morales on February 13, 2024. |
| 42. | A true and correct copy of Claim No. 100301-1, filed by Leda Manookian on January 31, 2024. |
| 43. | A true and correct copy of Claim No. 100945-1, filed by Lilua Del Rosso on February 9, 2024. |
| 44. | A true and correct copy of Claim No. 100344-1, filed by Lisa Johnson on February 2, 2024. |
| 45. | A true and correct copy of Claim No. 100521-1, filed by Lois Ruble on February 5, 2024. |
| 46. | A true and correct copy of Claim No. 102188-1, filed by Luz Benavides on February 22, 2024. |
| 47. | A true and correct copy of Claim No. 101035-1, filed by Lynda Denette Wilcox on February 17, 2024. |
| 48. | A true and correct copy of Claim No. 100215-1, filed by Maria Zilinskas on January 31, 2024. |
| 49. | A true and correct copy of Claim No. 101928-1, filed by Martin Grams-Stant on February 23, 2024. |

| EXHIBIT | JUDICIALLY NOTICED DOCUMENTS |
|---------|--|
| 50. | A true and correct copy of Claim No. 100644-1, filed by Marvin Gale & Sara Denise Ray on February 7, 2024. |
| 51. | A true and correct copy of Claim No. 101423-1, filed by Nabil Ahmed Sarsour on February 20, 2024. |
| 52. | A true and correct copy of Claim No. 101660-1, filed by Nationwide Appearance Attorneys, LLC on February 23, 2024. |
| 53. | A true and correct copy of Claim No. 101604-1, filed by Paulo A Cuellar on February 20, 2024. |
| 54. | A true and correct copy of Claim No. 101678-1, filed by Rebecca Burgett on February 21, 2024. |
| 55. | A true and correct copy of Claim No. 102237-1, filed by Robert Allen on February 23, 2024. |
| 56. | A true and correct copy of Claim No. 101159-1, filed by Russell Richardson on February 15, 2024. |
| 57. | A true and correct copy of Claim No. 102310-1, filed by Rustam Nazarov on February 23, 2024. |
| 58. | A true and correct copy of Claim No. 100313-1, filed by Sarah Adleman on February 1, 2024. |
| 59. | A true and correct copy of Claim No. 100478-1, filed by Scott Folda on February 5, 2024. |
| 60. | A true and correct copy of Claim No. 101055-1, filed by Shalise Dewitt on February 13, 2024. |
| 61. | A true and correct copy of Claim No. 100872-1, filed by Stephanie Ann Ingram on February 12, 2024. |
| 62. | A true and correct copy of Claim No. 101009-1, filed by Stephanie Kay Albertson on February 14, 2024. |

| 1 | EXHIBIT | JUDICIALLY NOTICED DOCUMENTS |
|----|---------|--|
| 2 | 63. | A true and correct copy of Claim No. 100476-1, filed by Stephanie Sciacca on February 5, 2024. |
| 4 | 64. | A true and correct copy of Claim No. 102009-1, filed by Stephanie Walker on February 22, 2024. |
| 6 | 65. | A true and correct copy of Claim No. 100939-1, filed by Stephanie Winters on February 14, 2024. |
| 8 | 66. | A true and correct copy of Claim No. 100090-1, filed by Sydney L Smith on January 25, 2024. |
| 10 | 67. | A true and correct copy of Claim No. 100554-1, filed by Teresa Booker on February 10, 2024. |
| 12 | 68. | A true and correct copy of Claim No. 101749-1, filed by Valerie S Furlow on February 21, 2024. |
| 14 | 69. | A true and correct copy of Claim No. 101871-1, filed by Vernetta A Dotson on February 22, 2024. |
| 16 | 70. | A true and correct copy of Claim No. 100456-1, filed by Victoria L Harris on February 5, 2024. |

DATED: September 20, 2024

MARSHACK HAYS WOOD LLP

By: /s/ Aaron E. de Leest
D. EDWARD HAYS
AARON E. DE LEEST
BRADFORD N. BARNHARDT
General Counsel for Chapter 11 Trustee,
Richard A. Marshack

DECLARATION OF ALINA MAMLYUK

I, Alina Mamlyuk, declare and state as follows:

I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth
Declaration.

3. The facts set forth below are true of my personal knowledge.

4. I am an attorney at law duly admitted to practice before this Court.

5. I am of counsel with the law firm of Marshack Hays Wood LLP, attorneys of record
Richard A. Marshack, the duly appointed Chapter 11 Trustee (“Trustee”) for the estate of the
London Practice Group, P.C. (“Debtor” or “LPG”).

6. I make this declaration in support of the Trustee’s Omnibus Objection To Claims Properly Designated As Administrative Claims (“Objection”). Capitalized terms not defined in this declaration shall have the meaning ascribed to them in the Objection.

7. I was assigned by the Trustee to investigate, verify and respond to administrative motions in this case.

8. I personally reviewed every Proof of Claim (“POC”) of the Objected Claims to see whether they qualified as an administrative expense because they had indicated on the form that they have been either a 503(b)(9) claim, a general 503(b) claim or indicated that the

9. I reviewed the docket to ensure that there have not been overlooked administrative
motions made by alleged claimants who did not appear to be former customers of LPG.

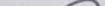
10. Attached to my declaration as Exhibits 1-70 are true and correct copies of the POCs
Objected Claims that were either filed with the Court or were filed with Omni.

11. Omni made available the POCs of the Objected Claims electronically for my review.

12. I spoke to Alleged Admin Claimant, Haley Simmoneau (Ms. Simmoneau), on the
on May 31, 2024, as she had submitted a declaration that was attached to the reply to the
administrative claim motion of Han Trinh [Docket No. 1124].

1 13. After my phone conversation with Ms. Simmoneau, I e-mailed her twice, on June 3,
2 2024, and on June 5, 2024, summarizing my notes from the phone call and asking for Ms.
3 Simmoneau to confirm my notes; Ms. Simmoneau did not respond.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
September 20, 2024.


ALINA MAMLYUK

ALINA MAMLYUK

Exhibit A
List of Objected Claims

List of Objected Claims

| Claimant (in Alphabetical Order) | Claim No.* | Date Filed | Total Claim Amount | Exhibit |
|----------------------------------|----------------|------------|-------------------------------|---------|
| Angel Rivera | C 571-2113.1 | 11/21/2023 | \$1,600.00 | 1 |
| Anita J Green | C 571-101829.1 | 02/20/2024 | \$2,198.52 | 2 |
| Anita L Coots | C 571-101228.1 | 02/13/2024 | \$3,640.27 | 3 |
| Anthony Stredick | C 571-100314.1 | 02/01/2024 | \$4,285.40 | 4 |
| Borhane Kaouache | C 571-102190.1 | 02/22/2024 | \$14,000.00 | 5 |
| Brinder Marshall | C 571-100618.1 | 02/05/2024 | Various amounts listed in POC | 6 |
| Carlos Bacsal | C 571-100717.1 | 02/06/2024 | \$22,877.40 | 7 |
| Carrie McLaughlin | C 571-100744.1 | 02/10/2024 | \$3,967.32 | 8 |
| Catrice Williams | C 571-964.1 | 09/24/2023 | \$3,216.00 | 9 |
| Celerina Mendez Cruz | C 571-101488.1 | 02/22/2024 | \$5,000.00 | 10 |
| Cheryl Harris | C 571-101977.1 | 02/22/2024 | \$5,949.60 | 11 |
| Chris & Kelly Behnke | C 571-100280.2 | 01/31/2024 | \$10,103.87 | 12 |
| Constance Plummer | C 571-100564.1 | 02/06/2024 | \$7,120.51 | 13 |
| Corissa Hammers | C 571-101438.1 | 02/20/2024 | \$4,699.00 | 14 |
| Cynthia Clifford | C 571-101060.1 | 02/14/2024 | \$8,349.33 | 15 |
| David B Waltz | C 571-101215.1 | 02/12/2024 | \$10,000.00 | 16 |
| Deborah Bonelli | C 571-100327.1 | 02/01/2024 | \$6,032.20 | 17 |
| Dennis E Theriault | C 571-101748.1 | 07/06/2023 | \$3,600.00 | 18 |
| Diana J Dalessio | C 571-101073.1 | 02/15/2024 | \$16,560.21 | 19 |
| Douglas Stiele | C 571-117.1 | 07/17/2023 | \$307,280.00 | 20 |
| Gerson David Cortes Membreno | C 571-102214.1 | 02/23/2024 | \$3,181.90 | 21 |
| Giorgio Giardinella | C 571-101030.1 | 02/15/2024 | \$11,241.42 | 22 |
| Gustavo Romani | C 571-101933.1 | 02/23/2024 | \$10,000.00 | 23 |
| Haley Simmoneau | C 571-106.3 | 01/18/2024 | \$65,000.00 | 24 |

| Claimant (in Alphabetical Order) | Claim No.* | Date Filed | Total Claim Amount | Exhibit |
|---|----------------|------------|--|---------|
| Haley Maree Anderson | C 571-101573.1 | 02/23/2024 | \$7,871.75 | 25 |
| Hanna Yager | C 571-101175.1 | 02/15/2024 | \$8,622.00 | 26 |
| Heather Silguero | C 571-101006.1 | 02/14/2024 | \$5,000.00 | 27 |
| Jacqueline Fomby-Lewis | C 571-102658.1 | 02/22/2024 | \$21,543.00 | 28 |
| Jason Ryer | C 571-101272.1 | 02/18/2024 | \$9,540.00 | 29 |
| Jenifer Pelayan | C 571-102230.1 | 02/23/2024 | \$3,000.25 | 30 |
| Jo Lynn Urlacher | C 571-100021.1 | 01/23/2024 | \$8,370.42 | 31 |
| Joseph C Takas | C 571-101969.1 | 02/22/2024 | \$6,648.38 | 32 |
| Joshua Miles | C 571-100175.1 | 01/29/2024 | \$20,425.04 | 33 |
| Julibelle Quintos | C 571-101387.1 | 02/19/2024 | \$4,341.46 | 34 |
| Kermic P Basat Jr | C 571-102205.1 | 02/23/2024 | \$2,367.19 | 35 |
| Kevin Kurka | C 571-101651.1 | 02/23/2024 | \$7,890.00 | 36 |
| Keysha Everage | C 571-100496.1 | 02/05/2024 | No amount is listed under 503(b)(9) although total POC is in the amount of \$5,581.63 | 37 |
| Kimberly O'Brien | C 571-100578.1 | 02/05/2024 | \$11,147.52 | 38 |
| Kirsten Campbell | C 571-100191.1 | 01/29/2024 | \$6,118.00 | 39 |
| Leah Bender; “Other names the creditor used with the debtor: Leah Sweeney” | C 571-100279.1 | 01/30/2024 | No amount is listed under 503(b)(9) although total POC is in the amount of \$25,000.00 | 40 |
| Leann Watson Morales | C 571-100635.1 | 02/13/2024 | \$5,828.18 | 41 |
| Leda Manookian | C 571-100301.1 | 01/31/2024 | \$6,281.55 | 42 |
| Lilua Del Rosso | C 571-100945.1 | 02/09/2024 | \$5,956.80 | 43 |

| Claimant (in Alphabetical Order) | Claim No.* | Date Filed | Total Claim Amount | Exhibit |
|--------------------------------------|----------------|------------|---|---------|
| Lisa Johnson | C 571-100344.1 | 02/02/2024 | No amount is listed under 503(b)(9) although total POC is in the amount of \$1,952.23 | 44 |
| Lois Ruble | C 571-100521.1 | 02/05/2024 | \$3,330.36 | 45 |
| Luz Benavides | C 571-102188.1 | 02/22/2024 | \$2,558.80 | 46 |
| Lynda Denette Wilcox | C 571-101035.1 | 02/17/2024 | \$6,187.77 | 47 |
| Maria Zilinskas | C 571-100215.1 | 01/31/2024 | \$11,807.00 | 48 |
| Martin Grams-Stant | C 571-101928.1 | 02/23/2024 | | 49 |
| Marvin Gale & Sara Denise Ray | C 571-100644.1 | 02/07/2024 | \$13,580.28 | 50 |
| Nabil Ahmed Sarsour | C 571-101423.1 | 02/20/2024 | \$9,783.00 | 51 |
| Nationwide Appearance Attorneys, LLC | C 571-101660.1 | 02/24/2024 | \$3,400.00 | 52 |
| Paulo A Cuellar | C 571-101604.1 | 02/20/2024 | \$5,132.85 | 53 |
| Rebecca Burgett | C 571-101678.1 | 02/21/2024 | \$3,600.00 | 54 |
| Robert Allen | C 571-102237.1 | 02/23/2024 | \$10,000.00 | 55 |
| Russell Richardson | C 571-101159.1 | 02/15/2024 | | 56 |
| Rustam Nazarov | C 571-102310.1 | 02/23/2024 | \$3,328.00 | 57 |
| Sarah Adleman | C 571-100313.1 | 02/01/2024 | \$10,723.50 | 58 |
| Scott Folda | C 571-100478.1 | 02/05/2024 | \$23,318.51 | 59 |
| Shalise Dewitt | C 571-101055.1 | 02/13/2024 | \$3,574.56 | 60 |
| Stephanie Ann Ingram | C 571-100872.1 | 02/12/2024 | \$5,000.00 | 61 |
| Stephanie Kay Albertson | C 571-101009.1 | 02/14/2024 | \$16,668.00 | 62 |
| Stephanie Sciacca | C 571-100476.1 | 02/05/2024 | \$1,918.50 | 63 |
| Stephanie Walker | C 571-102009.1 | 02/22/2024 | \$2,669.69 | 64 |
| Stephanie Winters | C 571-100939.1 | 02/14/2024 | \$6,392.04 | 65 |

| Claimant (in Alphabetical Order) | Claim No.* | Date Filed | Total Claim Amount | Exhibit |
|----------------------------------|----------------|------------|--------------------|---------|
| Sydney L Smith | C 571-100090.1 | 01/25/2024 | | 66 |
| Teresa Booker | C 571-100554.1 | 02/10/2024 | \$10,711.40 | 67 |
| Valerie S Furlow | C 571-101749.1 | 02/21/2024 | \$16,706.41 | 68 |
| Vernetta A Dotson | C 571-101871.1 | 02/22/2024 | \$4,600.00 | 69 |
| Victoria L Harris | C 571-100456.1 | 02/05/2024 | \$3,996.00 | 70 |

* Indicates a Claim No. provided by Omni based on the claims register maintained by Omni.
Copies of the Objected Claims are attached to the RJN as Exhibits 1-70.

4873-6401-0471, v. 1

EXHIBIT 1

Case 8:23-bk-10571-SC Claim 2113-1 Filed 11/21/23 Desc Main Document Page 1 of 3

Fill in this information to identify the case:

Debtor 1 The Litigation Practice Group P.C.

Debtor 2

(Spouse, if filing)

United States Bankruptcy Court **Central District of California**

Case number: **23-10571**

FILED

U.S. Bankruptcy Court
Central District of California

11/21/2023

Kathleen J. Campbell, Clerk

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filets must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

| | | | |
|--|--|---|----------------------------------|
| 1. Who is the current creditor? | Angel Rivera | | |
| | Name of the current creditor (the person or entity to be paid for this claim) | | |
| | Other names the creditor used with the debtor | | |
| 2. Has this claim been acquired from someone else? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____ | | |
| 3. Where should notices and payments to the creditor be sent? | Where should notices to the creditor be sent? | Where should payments to the creditor be sent? (if different) | |
| Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) | Angel Rivera | Name | Name |
| | 2833 Crockett St. Suite 505 Fort Worth, TX 76107 | | |
| | Contact phone _____ 5756936616 | Contact phone _____ | |
| | Contact email _____ arivera898@yahoo.com | Contact email _____ | |
| | Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____ | | |
| 4. Does this claim amend one already filed? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ | | Filed on _____ MM / DD / YYYY |
| 5. Do you know if anyone else has filed a proof of claim for this claim? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____ | | |

Case 8:23-bk-10571-SC Claim 2113-1 Filed 11/21/23 Desc Main Document Page 2 of 2

Part 2: Give Information About the Claim as of the Date the Case Was Filed

| | | |
|--|---|---|
| 6. Do you have any number you use to identify the debtor? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____ | |
| 7. How much is the claim? | \$ 1600.00 | Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A). |
| 8. What is the basis of the claim? | Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as healthcare information. Hired with LPG. \$20.00 an hour. Not Compensated for services. Not compensated for hours worked. | |
| 9. Is all or part of the claim secured? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ | |
| Basis for perfection: Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) | | |
| Value of property: | \$ _____ | |
| Amount of the claim that is secured: | \$ _____ | |
| Amount of the claim that is unsecured: | \$ _____ | (The sum of the secured and unsecured amounts should match the amount in line 7.) |
| Amount necessary to cure any default as of the date of the petition: | \$ _____ | |
| Annual Interest Rate (when case was filed) | % _____ | |
| <input type="checkbox"/> Fixed <input type="checkbox"/> Variable | | |
| 10. Is this claim based on a lease? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____ | |
| 11. Is this claim subject to a right of setoff? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____ | |

Case 8:23-bk-10571-SC Claim 2113-1 Filed 11/21/23 Desc Main Document Page 3 of 3

| | | | |
|--|--|--|-----------------------------|
| 12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)? | <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes. Check all that apply: | Amount entitled to priority |
| A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority. | <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____ <input type="checkbox"/> Up to \$3,350 * of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____ <input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150 *) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____ <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____ <input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____ <input checked="" type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(2) that applies \$ 1600.00 | | |
| <small>* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.</small> | | | |

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 11/21/2023
MM / DD / YYYY

/s/ Angel D. Rivera

Signature

Print the name of the person who is completing and signing this claim:

| | | | |
|---------------|---|-------------|----------------------|
| Name | Angel D. Rivera | | |
| Title | First name | Middle name | Last name |
| | Legal Secretary | | |
| Company | Litigation Practice Group | | |
| Address | Identify the corporate servicer as the company if the authorized agent is a servicer 2833 Crockett St. Suite 505 | | |
| | Number Street Fort Worth, TX 76107 | | |
| | City State ZIP Code | | |
| Contact phone | 575-693-6616 | Email | arivera898@yahoo.com |

◀ Back ▶ ◀ ▶

■ ■ ■ ○ ...

Welcome to LPG Law - Onboarding ↵

— ▲ ▼

Other mail

Desc Attachment 1

Shannon White swhite@lpglaw.com
To: arivera898@yahoo.com
Cc: Cecilia White, Han Trinh

Good afternoon Angel..

We are all looking forward to working with you. Our team just sent over new hire paperwork via our platform Paychex. Please check for an email if you do not see one it could also be in your spam folder.

The Paychex platform will ask for a few pieces of information to verify you including an email address, zip code and phone number. Sometimes our team does not have access to this information so a generic address and phone are entered to create your account. These aspects can be changed once you begin to fill out the online paperwork.

To verify you, the phone number we used is 575-693-6616
The address we used is: 2025 N Hull St, Clovis, NM 88101
The email address we used is arivera898@yahoo.com

Claim 2113-1 Part 2 Filed 11/21/23
Page 1 of 1 Your first day will be February 15, 2023.
You will be reporting to Tiffany Cornelius.
Please send your I9 documents to us on your first day if you need to know what documents are accepted see attached form.

Let me know if you have any questions or concerns!

Thanks,

Shannon White
Payroll & Human Resources

The Litigation Practice Group PC

P.O. Box 513018
Los Angeles, CA 90051
P: 714-454-5441
F: 949 315 4332
www.lpglaw.com

Case 8:23-bk-10571-SC Claim 2113-1 Part 2 Filed 11/21/23

NOTICE: This email message (including any attachments) may contain material that is confidential and/or legally privileged. Unless you are the intended recipient or are authorized to receive information for the intended recipient, you may not use, copy, or disclose any part of this message. If you have received this message in error, please notify us and delete all copies of it. Thank you

EXHIBIT 2

4537

UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA

Fill in the information to identify the case (Select only one Debtor per form):

The Litigation Practice Group P.C. (Case No. 23-10571)

FILED

FEB 2 2024

By Omni Agent Solutions, Claims Agent
For U.S. Bankruptcy Court
Central District of California

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Carefully read instructions included with this Proof of Claim before completing. In order to have your claim considered for payment and/or voting purposes, complete ALL applicable questions.

Part 1: Identify the Claim

1. Who is the current creditor?

Anita J. Green

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

No

Yes From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Anita J. Green

Anita J. Green

Name

Name

306 High Street

306 High Street

Number Street

Number Street

Kenton

TN

38233

Kenton

TN

38233

City

State

ZIP Code

City

State

ZIP Code

Contact Phone 931-279-2300

Contact Phone 931-279-2300

Contact email Ticksjirl.6424@yahoo.com

Contact email Ticksjirl.6424@yahoo.com

Uniform claim identifier for electronic payments in chapter 13 (if you use one)

4. Does this claim amend one already filed?

No

Yes

Claim Number on court claims registry (if known)

Filed On 3-20-2024
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

No

Yes

Who made the earlier filing?

101829-1 AD

Part 2: Give Information About the Claim as of the Date the Case Was Filed

| | | |
|--|--|--|
| 6. Do you have any number you use to identify the debtor? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | Last 4 digits of the debtor's account or any number you use to identify the debtor: _____ |
| 7. How much is the claim? | \$ 2198.52 | Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A). |
| 8. What is the basis of the claim? | Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information <i>money paid for services not rendered</i> | |
| 9. Is all or part of the claim secured? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | The claim is secured by a lien on property Nature of property: <input type="checkbox"/> Real Estate If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ |
| Basis for perfection: Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) | | |
| Value of Property: \$ _____ | | |
| Amount of the claim that is secured: \$ _____ | | |
| Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7). | | |
| Amount necessary to cure any default as of the date of the petition: \$ _____ | | |
| Annual Interest Rate: (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable | | |
| 10. Is this claim based on a lease? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | Amount necessary to cure any default as of the date of the petition. \$ _____ |
| 11. Is this claim subject to a right of setoff? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | Identify the property: _____ |
| 12. Is this claim for the value of goods received by the debtor within 20 days before the commencement date of this case (11 U.S.C. §503(b)(9))? | <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes | Amount of 503(b)(9) Claim: \$ _____ |

| | | |
|---|---|------------------------------------|
| 13. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <i>Check all that apply</i> | Amount entitled to priority |
| <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____ | | |
| <input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____ | | |
| <input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____ | | |
| <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____ | | |
| <input type="checkbox"/> Contributions to an employee benefit plan 11 U.S.C. § 507(a)(5). \$ _____ | | |
| <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(_____) that applies. \$ _____ | | |

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it.

FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.

18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am the guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 02/16/2024
MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name

Anita

First Name

J

Middle Name

Green

Last Name

Title

Company

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

306 High Street

Number

Street

Kenton

City

TN

State

38233

ZIP Code

Contact Phone

931-279-2300

Email

Ticksgirl6424@yahoo.co

SECURITY BANK

AND TRUST COMPANY
PO Box 1209
Paris, TN, 38242-1209

RETURN SERVICE REQUESTED

ANITA GREEN
306 HIGH ST
KENTON TN 38233-1002

Statement Ending 09/06/2022

ANITA GREEN

Customer Number: XXXXXXXX [REDACTED]

Page 1 of 6

Managing Your Accounts

| | |
|---|---|
|  Branch | Main Branch 210 W Washington Street Paris, TN 38242 |
|  Address | 1-833-937-7282 |
|  Phone | www.securitybanktn.com |
|  Website | |

Changes to Fee Schedule effective November 1, 2022: A Return Check Fee of \$32 may be charged per item per presentation when an insufficient funds item (including checks, in person withdrawals, ACH items, preauthorized transfers, and other electronic debits) is presented to your account. If item is not paid, the Merchant may attempt multiple times to collect items returned. You may be charged a \$32 Return Item Fee each time item is represented for payment. If item is paid, a \$32 Overdraft fee may be charged per item in addition to the Return Item Fee that may have been previously charged for that item.

Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|-----------------------|----------------|
| Security Checking + Interest | XXXXXXXXXX [REDACTED] | \$290.59 |

Security Checking + Interest-XXXXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount | Description | Amount |
|------------|-------------------------|------------|-----------------|----------|
| 08/03/2022 | Beginning Balance | \$400.00 | Minimum Balance | \$109.65 |
| | 3 Credit(s) This Period | \$2,192.00 | | |
| | 43 Debit(s) This Period | \$2,301.41 | | |
| 09/06/2022 | Ending Balance | \$290.59 | | |

Deposits

| Date | Description | Amount |
|------------|-------------|------------|
| 08/03/2022 | Deposit | \$1,045.00 |
| 08/19/2022 | Deposit | \$10.00 |

Electronic Credits

| Date | Description | Amount |
|------------|--|------------|
| 09/02/2022 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,137.00 |

Electronic Debits

| Date | Description | Amount |
|------------|--|----------|
| 08/03/2022 | ACH Withdrawal SEEDFI PREAMTHPMT 4INFO 888-858-8248 | \$240.00 |
| 08/04/2022 | ACH Withdrawal ATT Payment | \$10.00 |
| 08/05/2022 | ACH Withdrawal CIGNA 877-484-59 8774845967 | \$40.14 |



(united) 6 payments of 183.21 from 9-22 thru 2-23
(united) 6 payment of 183.21 from 3-23 thru 11-23
on Behalf of LPG. Total #2198.52

ANITA GREEN

XXXXXXXXXXXX

Statement Ending 09/06/2022

Page 4 of 6

Security Checking + Interest-XXXXXXXXXXXX (continued)

Electronic Debits (continued)

| Date | Description | Amount |
|------------|--|----------|
| 09/06/2022 | POS Debit DOLLAR TREE UNION CITY TN #8640 | \$32.85 |
| 09/06/2022 | POS Debit TACO BELL 027038 UNION CITY TN #8640 | \$34.40 |
| 09/06/2022 | POS Debit CASH APP* ANITA GREE 4153753176 CA #8640 | \$50.00 |
| 09/06/2022 | POS Debit DOLLAR-GENERAL # DYER TN #8640 | \$5.49 |
| 09/06/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$7.67 |
| 09/06/2022 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$41.89 |
| 09/06/2022 | ACH Withdrawal ATT Payment | \$10.00 |
| 09/06/2022 | ACH Withdrawal FPB CR CARD INTERNET INTERNET | \$30.00 |
| 09/06/2022 | ACH Withdrawal GEICO PREM COLL | \$65.85 |
| 09/06/2022 | ACH Withdrawal SEEDFI PREAUTHPMT 4INFO 888-858-8248 | \$240.00 |
| 09/06/2022 | ACH Withdrawal ZuntaFi WEB PMTS 817-438-2444 | \$183.21 |

Daily Balances

| Date | Amount | Date | Amount | Date | Amount |
|------------|------------|------------|----------|------------|------------|
| 08/03/2022 | \$1,205.00 | 08/12/2022 | \$511.66 | 08/30/2022 | \$167.84 |
| 08/04/2022 | \$1,195.00 | 08/15/2022 | \$339.76 | 08/31/2022 | \$149.79 |
| 08/05/2022 | \$1,113.16 | 08/17/2022 | \$329.76 | 09/01/2022 | \$109.65 |
| 08/08/2022 | \$1,047.31 | 08/19/2022 | \$305.48 | 09/02/2022 | \$1,228.15 |
| 08/09/2022 | \$822.24 | 08/22/2022 | \$202.84 | 09/06/2022 | \$290.59 |
| 08/10/2022 | \$545.24 | 08/29/2022 | \$192.84 | | |

Overdraft and Returned Item Fees

| | Total for this period | Total year-to-date |
|---------------------------------|-----------------------|--------------------|
| Total Overdraft Fees | \$0.00 | \$0.00 |
| Total Returned Item Fees | \$0.00 | \$0.00 |

SECURITY BANK

AND TRUST COMPANY

PO Box 1209
Paris, TN, 38242-1209

RETURN SERVICE REQUESTED

ANITA GREEN
306 HIGH ST
KENTON TN 38233-1002

Statement Ending 11/01/2022

ANITA GREEN
Customer Number: XXXXXXXX [REDACTED]

Page 1 of 6

Managing Your Accounts

| | |
|---|--|
|  Branch | Main Branch |
|  Address | 210 W Washington Street Paris, TN 38242 |
|  Phone | 1-833-937-7282 |
|  Website | www.securitybanktn.com |

Stay in the know with Alerts! Choose from a wide variety of account alerts to stay informed about the account activity that's important to you. Simply login to your online banking account & click ALERTS to get started. Visit our website and follow us on Facebook for helpful video tutorials!

Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|-----------------------|----------------|
| Security Checking + Interest | XXXXXXXXXX [REDACTED] | \$5.88 |

Security Checking + Interest-XXXXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount | Description | Amount |
|------------|-------------------------|------------|-----------------|--------|
| 10/05/2022 | Beginning Balance | \$869.28 | Minimum Balance | \$5.88 |
| | 3 Credit(s) This Period | \$523.20 | | |
| | 38 Debit(s) This Period | \$1,386.60 | | |
| 11/01/2022 | Ending Balance | \$5.88 | | |

Deposits

| Date | Description | Amount |
|------------|-------------|----------|
| 10/14/2022 | Deposit | \$300.00 |
| 10/21/2022 | Deposit | \$90.00 |
| 10/28/2022 | Deposit | \$133.20 |

Electronic Debits

| Date | Description | Amount |
|------------|--|----------|
| 10/05/2022 | ACH Withdrawal ATT Payment | \$10.00 |
| 10/06/2022 | ACH Withdrawal GEICO PREM COLL | \$65.85 |
| 10/06/2022 | ACH Withdrawal ZuntaFi WEB PMTS 817-438-2444 | \$183.21 |
| 10/07/2022 | ACH Withdrawal GLOBE LIFE INS INS. PREM | \$25.07 |
| 10/11/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$10.01 |
| 10/11/2022 | POS Debit LITTLE GE 301 S TRENTON RUTHERFORD TN #8640 | \$9.64 |
| 10/11/2022 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$21.19 |





AND TRUST COMPANY
PO Box 1209
Paris, TN, 38242-1209

RETURN SERVICE REQUESTED

ANITA GREEN
306 HIGH ST
KENTON TN 38233-1002

Statement Ending 12/06/2022

ANITA GREEN

Page 1 of 6

Customer Number: XXXXXXXX [REDACTED]

Managing Your Accounts

| | | |
|--|---------|--|
| | Branch | Main Branch |
| | Address | 210 W Washington Street Paris, TN 38242 |
| | Phone | 1-833-937-7282 |
| | Website | www.securitybanktn.com |

Change to Regular Savings Accounts effective January 1, 2023: Your Regular Savings Account will no longer be considered a Passbook account which means your transactions will not be recorded in your passbook. You will receive a statement from us at least quarterly effective January 1, 2023. You will receive a monthly statement for any month where an electronic item is posted to your account.

Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|-----------------------|----------------|
| Security Checking + Interest | XXXXXXXXXX [REDACTED] | \$272.26 |

Security Checking + Interest-XXXXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount | Description | Amount |
|------------|--------------------------|------------|-----------------|--------|
| 11/02/2022 | Beginning Balance | \$5.88 | Minimum Balance | \$1.47 |
| | 11 Credit(s) This Period | \$3,557.50 | | |
| | 58 Debit(s) This Period | \$3,291.12 | | |
| 12/06/2022 | Ending Balance | \$272.26 | | |

Deposits

| Date | Description | Amount |
|------------|-------------|----------|
| 11/04/2022 | Deposit | \$135.00 |
| 11/14/2022 | Deposit | \$183.00 |
| 11/14/2022 | Deposit | \$300.00 |
| 11/18/2022 | Deposit | \$180.00 |
| 11/23/2022 | Deposit | \$161.00 |
| 12/01/2022 | Deposit | \$11.00 |
| 12/05/2022 | Deposit | \$50.00 |
| 12/05/2022 | Deposit | \$220.00 |

Electronic Credits

| Date | Description | Amount |
|------------|---|------------|
| 11/03/2022 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,137.00 |
| 11/07/2022 | POS Credit CASH APP* CASH OUT SAN FRANCISCO CA #8640 | \$43.50 |
| 12/02/2022 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,137.00 |





Statement Ending 12/06/2022

ANITA GREEN

Customer Number: XXXXXXXX [REDACTED]

Page 3 of 6

Security Checking + Interest-XXXXXX [REDACTED] (continued)

Electronic Debits

| Date | Description | Amount |
|------------|--|----------|
| 11/02/2022 | POS Debit DOLLAR GENERAL #15648 KENTON TN #8640 | \$2.46 |
| 11/03/2022 | ATM Withdrawal 110 S MAIN STREET DYER TN #8640 | \$400.00 |
| 11/03/2022 | ACH Withdrawal SEEDFI PREAMTHPMT 4INFO 888-858-8248 | \$240.00 |
| 11/07/2022 | POS Debit OKINUS DEBIT 229-2944575 GA #8640 | \$83.40 |
| 11/07/2022 | POS Debit ACIMA CREDIT 800-7421789 UT #8640 | \$19.41 |
| 11/07/2022 | POS Debit CASH APP* ANITA GREE 4153753176 CA #8640 | \$10.00 |
| 11/07/2022 | POS Debit CASH APP* ANITA GREE 4153753176 CA #8640 | \$25.00 |
| 11/07/2022 | POS Debit CASH APP* ANITA GREE 4153753176 CA #8640 | \$10.00 |
| 11/07/2022 | POS Debit WAL-MART SUPER CENTER UNION CITY TN #8640 | \$13.51 |
| 11/07/2022 | ACH Withdrawal ATT Payment | \$10.00 |
| 11/07/2022 | ACH Withdrawal GEICO PREM COLL | \$65.83 |
| 11/07/2022 | ACH Withdrawal ZuntaFi WEB PMTS 817-438-2444 | \$183.21 |
| 11/07/2022 | ACH Withdrawal FPB CR CARD INTERNET INTERNET | \$30.57 |
| 11/08/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$10.00 |
| 11/08/2022 | ACH Withdrawal GLOBE LIFE INS INS. PREM | \$25.07 |
| 11/09/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$10.01 |
| 11/14/2022 | POS Debit DOLLAR-GENERAL #7088 DYER TN #8640 | \$12.20 |
| 11/14/2022 | POS Debit TATE'S KWIK STO DYER TN #8640 | \$5.69 |
| 11/14/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$10.04 |
| 11/14/2022 | ACH Withdrawal Credit One Bank Payment Credit One Bank,N.A. | \$30.00 |
| 11/14/2022 | ACH Withdrawal FBT CREDIT CARD PAYMENT CSQRPAYMENT | \$25.00 |
| 11/15/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$17.16 |
| 11/16/2022 | POS Debit DOLLAR GENERAL #15648 KENTON TN #8640 | \$11.08 |
| 11/16/2022 | POS Debit GPI* DAWKINS C STORE KENTON TN #8640 | \$12.77 |
| 11/16/2022 | POS Debit TATE'S KWIK STO DYER TN #8640 | \$14.87 |
| 11/16/2022 | ACH Withdrawal 1st Franklin Fin TRANS PMT | \$277.00 |
| 11/17/2022 | ACH Withdrawal Credit One Bank Payment Credit One Bank,N.A. | \$100.00 |
| 11/17/2022 | ACH Withdrawal CONT FINANCE PAY BY PHO | \$35.00 |
| 11/17/2022 | ACH Withdrawal GENESIS-FS CARD PAYMENT TELECHK 800-697-9263 | \$40.00 |

ANITA GREEN

XXXXXXXXXXXX

Statement Ending 12/06/2022

Page 4 of 6

Security Checking + Interest-XXXXXXXXXXXX (continued)

Electronic Debits (continued)

| Date | Description | Amount |
|------------|--|----------|
| 11/21/2022 | POS Debit CASH APP* ANITA GREE 4153753176 CA #8640 | \$10.00 |
| 11/21/2022 | POS Debit GPI* DAWKINS C STORE KENTON TN #8640 | \$29.16 |
| 11/21/2022 | POS Debit OKINUS DEBIT 229-2944575 GA #8640 | \$78.40 |
| 11/21/2022 | POS Debit ACIMA CREDIT 800-7421789 UT #8640 | \$81.80 |
| 11/21/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$47.62 |
| 11/22/2022 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$6.65 |
| 11/28/2022 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$17.73 |
| 11/28/2022 | POS Debit DOLLAR GENERAL #15648 KENTON TN #8640 | \$8.27 |
| 11/28/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$38.19 |
| 11/28/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$15.57 |
| 12/01/2022 | POS Debit CITY OF KENTON 731-7495767 TN #8640 | \$73.45 |
| 12/01/2022 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$8.06 |
| 12/02/2022 | POS Debit FAST PACE URGENT CARE FRANKLIN TN #8640 | \$10.00 |
| 12/05/2022 | POS Debit TATE'S KWIK STO DYER TN #8640 | \$15.35 |
| 12/05/2022 | POS Debit GPI* DAWKINS C STORE KENTON TN #8640 | \$10.01 |
| 12/05/2022 | POS Debit CASH APP* ANITA GREE 4153753176 CA #8640 | \$10.00 |
| 12/05/2022 | POS Debit CASH APP* ANITA GREE 4153753176 CA #8640 | \$10.00 |
| 12/05/2022 | POS Debit DOLLAR-GENERAL #7088 DYER TN #8640 | \$13.44 |
| 12/05/2022 | POS Debit LITTLE GENERAL 3 DYER TN #8640 | \$12.48 |
| 12/05/2022 | POS Debit GPI* DAWKINS C STORE KENTON TN #8640 | \$6.39 |
| 12/05/2022 | POS Debit FOOD RITE #22 DYER TN #8640 | \$17.55 |
| 12/05/2022 | POS Debit SQ * SPEED MART INC TRENTON TN #8640 | \$17.15 |
| 12/05/2022 | ACH Withdrawal SEEDFI PREAUTHPMT 4INFO 888-858-8248 | \$240.00 |
| 12/06/2022 | POS Debit MCDONALD'S F13164 TRENTON TN #8640 | \$5.90 |
| 12/06/2022 | POS Debit MAVERICK 101 DAVY CRO TRENTON TN #8640 | \$5.00 |
| 12/06/2022 | ACH Withdrawal GEICO PREM COLL | \$80.46 |
| 12/06/2022 | ACH Withdrawal ZuntaFi WEB PMTS 817-438-2444 | \$183.21 |
| 12/06/2022 | ACH Withdrawal ATT Payment | \$10.00 |

Other Debits

| Date | Description | Amount |
|------------|-----------------|----------|
| 12/02/2022 | Cash Withdrawal | \$500.00 |



SECURITY BANK
AND TRUST COMPANY

Statement Ending 02/07/2023

ANITA GREEN

Page 3 of 6

Customer Number: XXXXXXXX [REDACTED]

Security Checking + Interest - XXXXXXXX [REDACTED]

(continued)

Credits (continued)

| Date | Description | Amount |
|------------|---|------------|
| 01/25/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$300.00 |
| 01/27/2023 | Deposit | \$180.00 |
| 02/02/2023 | Deposit | \$40.00 |
| 02/02/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$300.00 |
| 02/03/2023 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,236.00 |

Debits

| Date | Description | Amount |
|------------|---|----------|
| 01/04/2023 | ACH Withdrawal Systems & Serv. Loan Pmt | \$240.00 |
| 01/05/2023 | ACH Withdrawal FPB CR CARD INTERNET INTERNET | \$56.65 |
| 01/06/2023 | ACH Withdrawal ATT Payment | \$10.00 |
| 01/06/2023 | ACH Withdrawal ZuntaFi WEB PMTS 817-438-2444 | \$183.21 |
| 01/09/2023 | POS Debit LITTLE GENERAL 3 DYER TN #8640 | \$9.21 |
| 01/09/2023 | POS Debit LITTLE GENERAL 3 DYER TN #8640 | \$10.00 |
| 01/09/2023 | ACH Withdrawal GLOBE LIFE INS INS. PREM | \$25.07 |
| 01/10/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$22.68 |
| 01/10/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$13.46 |
| 01/10/2023 | ACH Withdrawal ERIEINSURANCEWEB PAYMENT | \$64.00 |
| 01/11/2023 | POS Debit CASH APP*ANITA GREE 4153753176 CA #8640 | \$10.00 |
| 01/13/2023 | POS Debit ACIMA CREDIT 800-7421789 UT #8640 | \$63.71 |
| 01/13/2023 | POS Debit GPI*DAWKINS C STORE KENTON TN #8640 | \$20.84 |
| 01/13/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$16.59 |
| 01/13/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$10.07 |
| 01/17/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$18.30 |
| 01/17/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank,N.A. | \$61.00 |
| 01/17/2023 | ACH Withdrawal MERCURY CARD FBT PAYMENT CSQRPAYMENT | \$25.00 |
| 01/18/2023 | POS Debit CASH APP*ANITA GREE 4153753176 CA #8640 | \$10.00 |
| 01/19/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$17.74 |



SECURITY BANK
AND TRUST COMPANY

PO Box 1209
Paris, TN 38242-1209

Return Service Requested

Statement Ending 02/07/2023

ANITA GREEN

Customer Number: XXXXXXXX [REDACTED]

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306 HIGH ST
KENTON TN 38233

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Call us today to verify your information! 1-833-937-7282

Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|--------------------|----------------|
| Security Checking + Interest | XXXXXXX [REDACTED] | \$5.95 |

Security Checking + Interest - XXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount |
|------------|-------------------------|------------|
| 01/04/2023 | Beginning Balance | \$639.53 |
| | 8 Credit(s) This Period | \$2,566.00 |
| | 48 Debit(s) This Period | \$3,199.58 |
| 02/07/2023 | Ending Balance | \$5.95 |

Credits

| Date | Description | Amount |
|------------|-------------|----------|
| 01/04/2023 | Deposit | \$270.00 |
| 01/10/2023 | Deposit | \$40.00 |
| 01/11/2023 | Deposit | \$200.00 |





Statement Ending 02/07/2023

ANITA GREEN

Page 4 of 6

Customer Number: XXXXXXXX [REDACTED]

Security Checking + Interest - XXXXXXXXX [REDACTED] (continued)

Debits (continued)

| Date | Description | Amount |
|------------|--|----------|
| 01/19/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank,N.A. | \$61.00 |
| 01/20/2023 | POS Debit MAVERICK 101 DAVY CRO TRENTON TN #8640 | \$15.01 |
| 01/20/2023 | POS Debit MCDONALD'S F13164 TRENTON TN #8640 | \$9.21 |
| 01/23/2023 | POS Debit TACO BELL 040020 TRENTON TN #8640 | \$14.48 |
| 01/24/2023 | POS Debit MDC*GIBSON ELECTRI U96 TRENTON TN #8640 | \$4.40 |
| 01/24/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$43.05 |
| 01/24/2023 | ACH Withdrawal CONT FINANCE PAY BY PHO | \$35.00 |
| 01/24/2023 | ACH Withdrawal GENESIS-FS CARD PAYMENT TELECHK 800-697-9263 | \$40.00 |
| 01/25/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$16.05 |
| 01/26/2023 | POS Debit HESTER DRUG COMPANY RUTHERFORD TN #8640 | \$10.00 |
| 01/27/2023 | ACH Withdrawal 1st Franklin Fin TRANS PMT | \$292.00 |
| 01/30/2023 | POS Debit FOOD RITE #22 DYER TN #8640 | \$17.57 |
| 01/30/2023 | POS Debit MCDONALD'S F33377 NEWBERN TN #8640 | \$10.31 |
| 01/31/2023 | ACH Withdrawal GibsonEC PAYMENT | \$142.00 |
| 02/02/2023 | ATM Withdrawal 2711 NORTH CENTRAL AVE HUMBOLDT TN #8640 | \$100.00 |
| 02/03/2023 | POS Debit GIBSON COUNTY CLERK TRENTON TN #8640 | \$28.89 |
| 02/03/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$16.71 |
| 02/03/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$20.01 |
| 02/03/2023 | Cash Withdrawal | \$650.00 |
| 02/06/2023 | POS Debit ACIMA CREDIT 800-7421789 UT #8640 | \$187.95 |
| 02/06/2023 | POS Debit CASH APP*ANITA GREE 4153753176 CA #8640 | \$10.00 |
| 02/06/2023 | ACH Withdrawal ERIE INS GROUP ERIEXPSPAY | \$64.00 |
| 02/06/2023 | ACH Withdrawal Systems & Serv. Loan Pmt | \$240.00 |
| 02/06/2023 | ACH Withdrawal ZuntaFi WEB PMTS 817-438-2444 | \$183.21 |
| 02/06/2023 | ACH Withdrawal ATT Payment | \$10.00 |
| 02/06/2023 | ACH Withdrawal FPB CR CARD INTERNET INTERNET | \$41.13 |



SECURITY BANK
AND TRUST COMPANY

PO Box 1209
Paris, TN 38242-1209

Return Service Requested

Statement Ending 04/04/2023

ANITA GREEN

Customer Number: XXXXXXXX [REDACTED]

Page 1 of 5

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ANITA GREEN
306 HIGH ST
KENTON TN 38233

Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|--------------------|----------------|
| Security Checking + Interest | XXXXXXX [REDACTED] | \$771.20 |

Security Checking + Interest - XXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount |
|------------|-------------------------|------------|
| 03/08/2023 | Beginning Balance | \$327.62 |
| | 5 Credit(s) This Period | \$2,351.00 |
| | 35 Debit(s) This Period | \$1,907.42 |
| 04/04/2023 | Ending Balance | \$771.20 |

Credits

| Date | Description | Amount |
|------------|--|------------|
| 03/10/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$300.00 |
| 03/13/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$15.00 |
| 03/17/2023 | Deposit | \$200.00 |
| 03/30/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$600.00 |
| 04/03/2023 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,236.00 |

Debits

| Date | Description | Amount |
|------------|---|----------|
| 03/09/2023 | POS Debit UNIVERSAL ACCOUNT SERV 888-233-2302 MO #8640 | \$183.21 |
| 03/09/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$22.83 |





SECURITY BANK
AND TRUST COMPANY

Statement Ending 08/01/2023

ANITA GREEN

Page 3 of 3

Customer Number: XXXXXXXX [REDACTED]

Security Checking + Interest - XXXXXXXX [REDACTED] (continued)

Debits

| Date | Description | Amount |
|------------|---|----------|
| 07/05/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$30.83 |
| 07/05/2023 | POS Debit DOLLAR GENERAL #15648 KENTON TN #8640 | \$9.68 |
| 07/05/2023 | ACH Withdrawal CASH EXPRESS FLEX PAYMT | \$90.10 |
| 07/05/2023 | ACH Withdrawal ERIE INS GROUP ERIEXPSPAY | \$64.00 |
| 07/05/2023 | ACH Withdrawal Systems & Serv. Loan Pmt | \$240.00 |
| 07/06/2023 | ACH Withdrawal ATT Payment | \$19.99 |
| 07/06/2023 | ACH Withdrawal UAS 8882332302 20230705073001UASACH | \$183.21 |
| 07/07/2023 | ACH Withdrawal GLOBE LIFE INS INS. PREM | \$25.07 |
| 07/10/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$13.89 |
| 07/10/2023 | ACH Withdrawal FPB CR CARD INTERNET INTERNET | \$30.00 |
| 07/11/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank | \$30.00 |
| 07/11/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank | \$40.00 |
| 07/11/2023 | ACH Withdrawal GibsonEC PAYMENT | \$142.27 |
| 07/11/2023 | ACH Withdrawal MERCURY CARD FBT PAYMENT CSQRPAYMENT | \$20.00 |
| 07/14/2023 | ACH Withdrawal CONT FINANCE PAY BY PHO | \$35.00 |
| 07/14/2023 | ACH Withdrawal GENESIS-FS CARD PAYMENT TELECHK 800-697-9263 | \$40.00 |
| 07/19/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$15.96 |
| 07/19/2023 | ACH Withdrawal 1st Franklin Fin TRANS PMT | \$292.00 |

Daily Balances

| Date | Amount | Date | Amount | Date | Amount |
|-------|----------|-------|----------|-------|----------|
| 07/05 | \$291.65 | 07/10 | \$309.49 | 07/17 | \$312.22 |
| 07/06 | \$88.45 | 07/11 | \$77.22 | 07/19 | \$4.26 |
| 07/07 | \$63.38 | 07/14 | \$2.22 | | |

Overdraft and Returned Item Fees

| | Total for this period | Total year-to-date |
|---------------------------------|-----------------------|--------------------|
| Total Overdraft Fees | \$0.00 | \$0.00 |
| Total Returned Item Fees | \$0.00 | \$0.00 |



Statement Ending 08/01/2023

ANITA GREEN
Customer Number: XXXXXXXX [REDACTED]

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KENTON TN 38233

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Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|--------------------|----------------|
| Security Checking + Interest | XXXXXXX [REDACTED] | \$4.26 |

Security Checking + Interest - XXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount |
|------------|-------------------------|------------|
| 07/05/2023 | Beginning Balance | \$726.26 |
| | 2 Credit(s) This Period | \$600.00 |
| | 18 Debit(s) This Period | \$1,322.00 |
| 08/01/2023 | Ending Balance | \$4.26 |

Credits

| Date | Description | Amount |
|------------|------------------------------|----------|
| 07/10/2023 | POS Credit | \$290.00 |
| | CHIME SAN FRANCISCO CA #8640 | |
| 07/17/2023 | POS Credit | \$310.00 |
| | CHIME SAN FRANCISCO CA #8640 | |





SECURITY BANK
AND TRUST COMPANY

Statement Ending 09/05/2023

ANITA GREEN

Page 3 of 5

Customer Number: XXXXXXXX [REDACTED]

Security Checking + Interest - XXXXXXXX [REDACTED] (continued)

Debits (continued)

| Date | Description | Amount |
|------------|---|----------|
| 08/03/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$10.00 |
| 08/04/2023 | ACH Withdrawal ATT Payment | \$10.00 |
| 08/04/2023 | ACH Withdrawal ERIE INS GROUP ERIEXPSPAY | \$64.00 |
| 08/04/2023 | ACH Withdrawal CASH EXPRESS FLEX PAYMT | \$94.16 |
| 08/04/2023 | ACH Withdrawal Systems & Serv. Loan Pmt | \$240.00 |
| 08/07/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$20.35 |
| 08/07/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$32.10 |
| 08/07/2023 | POS Debit WAL-MART SUPER CENTER UNION CITY TN #8640 | \$8.35 |
| 08/07/2023 | ACH Withdrawal UAS 8882332302 20230804073001UASACH | \$183.21 |
| 08/07/2023 | ACH Withdrawal MERCURY CARD FBT PAYMENT CSQRPAYMENT | \$25.00 |
| 08/08/2023 | ACH Withdrawal GLOBE LIFE INS INS. PREM | \$25.07 |
| 08/09/2023 | ACH Withdrawal FPB CR CARD INTERNET INTERNET | \$60.00 |
| 08/09/2023 | ACH Withdrawal GibsonEC PAYMENT | \$163.57 |
| 08/10/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$23.42 |
| 08/14/2023 | ACH Withdrawal 1st Franklin Fin TRANS PMT | \$277.00 |
| 08/14/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank | \$30.00 |
| 08/15/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$13.76 |
| 08/16/2023 | ACH Withdrawal UAS 8882332302 20230815073001UASACH | \$5.00 |
| 08/18/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$10.75 |
| 08/18/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$10.01 |
| 08/18/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$8.77 |
| 08/18/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank | \$41.00 |
| 08/18/2023 | ACH Withdrawal CONT FINANCE PAY BY PHO | \$35.00 |
| 08/18/2023 | ACH Withdrawal GENESIS-FS CARD PAYMENT TELECHK 800-697-9263 | \$40.00 |
| 08/21/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$14.75 |
| 08/21/2023 | POS Debit FOOD RITE #22 DYER TN #8640 | \$5.99 |



SECURITY BANK
AND TRUST COMPANY

PO Box 1209
Paris, TN 38242-1209

Return Service Requested

Statement Ending 09/05/2023

ANITA GREEN

Page 1 of 5

Customer Number: XXXXXXXX [REDACTED]

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KENTON TN 38233

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Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|-----------------------|----------------|
| Security Checking + Interest | XXXXXXXXXX [REDACTED] | \$666.16 |

Security Checking + Interest - XXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount |
|------------|-------------------------|------------|
| 08/02/2023 | Beginning Balance | \$4.26 |
| | 7 Credit(s) This Period | \$3,286.00 |
| | 43 Debit(s) This Period | \$2,624.10 |
| 09/05/2023 | Ending Balance | \$666.16 |

Credits

| Date | Description | Amount |
|------------|--|------------|
| 08/03/2023 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,236.00 |
| 08/03/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$175.00 |
| 08/11/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$300.00 |
| 08/15/2023 | ACH Deposit Cash App * Cash App T2050370 | \$9.00 |
| 08/17/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$300.00 |
| 09/01/2023 | Deposit | \$30.00 |
| 09/01/2023 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,236.00 |

Debits

| Date | Description | Amount |
|------------|--|----------|
| 08/03/2023 | ATM Withdrawal 110 S MAIN STREET DYER TN #8640 | \$400.00 |





SECURITY BANK
AND TRUST COMPANY

Statement Ending 10/03/2023

ANITA GREEN

Page 3 of 6

Customer Number: XXXXXXXX [REDACTED]

Security Checking + Interest - XXXXXXXX [REDACTED] (continued)

Credits (continued)

| Date | Description | Amount |
|------------|--|------------|
| 09/22/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$150.00 |
| 10/03/2023 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,236.00 |

Debits

| Date | Description | Amount |
|------------|---|----------|
| 09/06/2023 | POS Debit WALMART.COM WALMART.COM AR #8640 | \$19.72 |
| 09/06/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank | \$30.00 |
| 09/06/2023 | ACH Withdrawal FPB CR CARD INTERNET INTERNET | \$30.00 |
| 09/06/2023 | ACH Withdrawal Systems & Serv. Loan Pmt | \$240.00 |
| 09/06/2023 | ACH Withdrawal UAS 8882332302 20230905073004UASACH | \$183.21 |
| 09/06/2023 | ACH Withdrawal MERCURY CARD FBT PAYMENT CSQRPAYMENT | \$52.88 |
| 09/07/2023 | ACH Withdrawal GLOBE LIFE INS INS. PREM | \$25.07 |
| 09/08/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$10.26 |
| 09/11/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$16.35 |
| 09/11/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$6.80 |
| 09/11/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$20.94 |
| 09/12/2023 | ACH Withdrawal 1st Franklin Fin TRANS PMT | \$277.00 |
| 09/13/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$16.35 |
| 09/14/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$16.55 |
| 09/14/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$13.76 |
| 09/18/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$14.98 |
| 09/18/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$18.35 |
| 09/18/2023 | POS Debit DOLLAR GENERAL #15648 KENTON TN #8640 | \$11.41 |
| 09/18/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$14.79 |
| 09/18/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$31.73 |
| 09/19/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$6.01 |



Statement Ending 10/03/2023

ANITA GREEN Page 1 of 6

Customer Number: XXXXXXXX [REDACTED]

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CHOICES

Choose how you want to receive alerts- email, text, or at next login.

PROTECTION

Get alerts if someone changes your information or is trying to get access to your online banking.

Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|---------------------|----------------|
| Security Checking + Interest | XXXXXXXX [REDACTED] | \$1,241.47 |

Security Checking + Interest - XXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount |
|------------|-------------------------|------------|
| 09/06/2023 | Beginning Balance | \$666.16 |
| | 5 Credit(s) This Period | \$2,146.00 |
| | 44 Debit(s) This Period | \$1,570.69 |
| 10/03/2023 | Ending Balance | \$1,241.47 |

Credits

| Date | Description | Amount |
|------------|--|----------|
| 09/08/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$300.00 |
| 09/18/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$150.00 |
| 09/20/2023 | Deposit | \$310.00 |





SECURITY BANK
AND TRUST COMPANY

Statement Ending 11/07/2023

ANITA GREEN

Page 3 of 5

Customer Number: XXXXXXXX7800

Security Checking + Interest - XXXXXXXX

(continued)

Debits (continued)

| Date | Description | Amount |
|------------|--|----------|
| 10/04/2023 | ACH Withdrawal FPB CR CARD INTERNET INTERNET | \$30.00 |
| 10/04/2023 | ACH Withdrawal GibsonEC PAYMENT | \$30.67 |
| 10/04/2023 | ACH Withdrawal Systems & Serv. Loan Pmt | \$240.00 |
| 10/04/2023 | Cash Withdrawal | \$50.00 |
| 10/05/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$8.37 |
| 10/05/2023 | ACH Withdrawal UAS 8882332302 20231004073001UASACH | \$183.21 |
| 10/05/2023 | ACH Withdrawal MERCURY CARD FBT PAYMENT CSQRPAYMENT | \$52.83 |
| 10/06/2023 | POS Debit KROGER #4 35 W UNIVERS JACKSON TN #8640 | \$37.55 |
| 10/06/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$26.94 |
| 10/10/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$7.53 |
| 10/10/2023 | ACH Withdrawal GLOBE LIFE INS INS. PREM | \$25.07 |
| 10/10/2023 | ACH Withdrawal ATT Payment | \$10.00 |
| 10/16/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$14.49 |
| 10/16/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$16.16 |
| 10/16/2023 | POS Debit DOLLAR GENERAL #15648 KENTON TN #8640 | \$10.95 |
| 10/17/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$7.22 |
| 10/17/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank | \$30.00 |
| 10/18/2023 | POS Debit TATE'S KWIK STOP #2 DYER TN #8640 | \$10.10 |
| 10/19/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$17.78 |
| 10/19/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$15.88 |
| 10/19/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$2.21 |
| 10/19/2023 | POS Debit MCDONALD'S F13164 TRENTON TN #8640 | \$17.65 |
| 10/20/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$5.49 |
| 10/23/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$12.12 |
| 10/23/2023 | ACH Withdrawal CONCORA CREDIT PAYMENT TELECHK 800-697-9263 | \$40.00 |
| 10/23/2023 | ACH Withdrawal CONT FINANCE PAY BY PHO | \$37.00 |



Return Service Requested

Statement Ending 11/07/2023

ANITA GREEN

Page 1 of 5

Customer Number: XXXXXXXX [REDACTED]

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Summary of Accounts

| Account Type | Account Number | Ending Balance |
|------------------------------|--------------------|----------------|
| Security Checking + Interest | XXXXXXX [REDACTED] | \$113.09 |

Security Checking + Interest - XXXXXXXX [REDACTED]

Account Summary

| Date | Description | Amount |
|------------|-------------------------|------------|
| 10/04/2023 | Beginning Balance | \$1,241.47 |
| | 6 Credit(s) This Period | \$1,619.15 |
| | 46 Debit(s) This Period | \$2,747.53 |
| 11/07/2023 | Ending Balance | \$113.09 |

Credits

| Date | Description | Amount |
|------------|---|------------|
| 10/10/2023 | Deposit | \$15.00 |
| 10/13/2023 | POS Credit CHIME SAN FRANCISCO CA #8640 | \$300.00 |
| 10/27/2023 | Deposit | \$10.00 |
| 11/03/2023 | ACH Deposit SSA TREAS 310 XXSOC SEC | \$1,236.00 |
| 11/06/2023 | POS Credit CASH APP*ANITA GREEN*C SAN FRANCISCO CA | \$14.74 |
| 11/06/2023 | POS Credit PAYPAL*GREEN ANITA SAN JOSE CA #8640 | \$43.41 |

Debits

| Date | Description | Amount |
|------------|--|----------|
| 10/04/2023 | ATM Withdrawal 107 N POPLAR KENTON TN #8640 | \$403.00 |
| 10/04/2023 | ACH Withdrawal ERIE INS GROUP ERIEXPSPAY | \$64.00 |
| 10/04/2023 | ACH Withdrawal CASH EXPRESS FLEX PAYMT | \$77.33 |





SECURITY BANK
AND TRUST COMPANY

Statement Ending 11/07/2023

ANITA GREEN

Page 4 of 5

Customer Number: XXXXXXXX [REDACTED]

Security Checking + Interest - XXXXXXXX [REDACTED] (continued)

Debits (continued)

| Date | Description | Amount |
|------------|---|----------|
| 10/23/2023 | ACH Withdrawal Credit One Bank Payment Credit One Bank | \$40.00 |
| 10/27/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$21.12 |
| 10/27/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$3.69 |
| 10/30/2023 | POS Debit LITTLE GENERAL 6 KENTON TN #8640 | \$16.00 |
| 11/03/2023 | POS Debit LITTLE GENERAL TRENTON TN #8640 | \$11.96 |
| 11/03/2023 | Cash Withdrawal | \$375.00 |
| 11/06/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$30.45 |
| 11/06/2023 | POS Debit DAWKINS C-STORE KENTON TN #8640 | \$16.45 |
| 11/06/2023 | POS Debit DOLLAR GENERAL #15648 KENTON TN #8640 | \$5.07 |
| 11/06/2023 | POS Debit MCDONALD'S F12029 MILAN TN #8640 | \$6.45 |
| 11/06/2023 | POS Debit FOOD RITE #32 KENTON TN #8640 | \$21.93 |
| 11/06/2023 | ACH Withdrawal CASH EXPRESS FLEX PAYMT | \$85.58 |
| 11/06/2023 | ACH Withdrawal ERIE INS GROUP ERIEXPSPAY | \$172.00 |
| 11/06/2023 | ACH Withdrawal Systems & Serv. Loan Pmt | \$240.00 |
| 11/07/2023 | ACH Withdrawal ATT Payment | \$10.00 |
| 11/07/2023 | ACH Withdrawal GLOBE LIFE INS INS. PREM | \$25.07 |
| 11/07/2023 | ACH Withdrawal UAS 8882332302 20231106073001UASACH | \$183.21 |

Daily Balances

| Date | Amount | Date | Amount | Date | Amount |
|-------|----------|-------|----------|-------|----------|
| 10/04 | \$346.47 | 10/17 | \$231.15 | 10/30 | \$2.11 |
| 10/05 | \$102.06 | 10/18 | \$221.05 | 11/03 | \$851.15 |
| 10/06 | \$37.57 | 10/19 | \$167.53 | 11/06 | \$331.37 |
| 10/10 | \$9.97 | 10/20 | \$162.04 | 11/07 | \$113.09 |
| 10/13 | \$309.97 | 10/23 | \$32.92 | | |
| 10/16 | \$268.37 | 10/27 | \$18.11 | | |

Overdraft and Returned Item Fees

| | Total for this period | Total year-to-date |
|---------------------------------|-----------------------|--------------------|
| Total Overdraft Fees | \$0.00 | \$0.00 |
| Total Returned Item Fees | \$0.00 | \$0.00 |

Unit 1A
304 High Street
Kenton, TN 38233

The Litigation Practice Group, PLLC
c/o Omnic Agent Solutions Inc.
100 De Soto Avenue, Suite 100
5955 Woodland Hills, CA 91367

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EXHIBIT 3

4198

UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA

Fill in the information to identify the case (Select only one Debtor per form):

The Litigation Practice Group P.C. (Case No. 23-10571)

FILED

FEB 13 2024

By Omni Agent Solutions, Claims Agent
For U.S. Bankruptcy Court
Central District of California

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Carefully read instructions included with this Proof of Claim before completing. In order to have your claim considered for payment and/or voting purposes, complete ALL applicable questions.

Part 1: Identify the Claim

1. Who is the current creditor?

Anita L. COOTS

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

No

Yes From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Anita L. COOTS

n/a

2220 E. Murray Holladay Rd #403

Number Street

Number Street

Salt Lake Ut. 84117

City State ZIP Code

City State ZIP Code

Contact Phone 385-222-0245

Contact Phone _____

Contact email jensen.anita1673@gmail.com

Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one)

4. Does this claim amend one already filed?

No

Yes

Claim Number on court claims registry (if known) _____

Filed On

MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

No

Yes

Who made the earlier filing? Anita L. COOTS

101228-1

Part 2: Give Information About the Claim as of the Date the Case Was Filed

| | | |
|--|---|--|
| 6. Do you have any number you use to identify the debtor? | <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes | Last 4 digits of the debtor's account or any number you use to identify the debtor: [REDACTED] |
| 7. How much is the claim? | \$ 3,640.27 | Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A). |
| 8. What is the basis of the claim? | Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information <i>(See attached copies)</i> | |
| 9. Is all or part of the claim secured? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | The claim is secured by a lien on property |
| Nature of property: <input type="checkbox"/> Real Estate If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ | | |
| Basis for perfection: Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded). | | |
| Value of Property: \$ _____ | | |
| Amount of the claim that is secured: \$ _____ | | |
| Amount of the claim that is unsecured: \$ 3,640.27 (The sum of the secured and unsecured amounts should match the amount in line 7). | | |
| Amount necessary to cure any default as of the date of the petition: \$ _____ | | |
| Annual Interest Rate: (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable | | |
| 10. Is this claim based on a lease? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | Amount necessary to cure any default as of the date of the petition. \$ _____ |
| 11. Is this claim subject to a right of setoff? | <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | Identify the property: _____ |
| 12. Is this claim for the value of goods received by the debtor within 20 days before the commencement date of this case (11 U.S.C. §503(b)(9))? | <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes | Amount of 503(b)(9) Claim: \$ 3,640.27 |

| | | | |
|--|-----------------------------|---|------------------------------------|
| 13. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)? | <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes Check all that apply | Amount entitled to priority |
| <p>A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.</p> | | | \$ _____ |
| <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input checked="" type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for <u>personal</u> family, or household use. 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Contributions to an employee benefit plan 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(____) that applies. \$ _____ | | | \$ <u>3,640.27</u> |
| <small>* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.</small> | | | |

Part 3: Sign Below

Anita L. Coots

The person completing this proof of claim must sign and date it.

FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- I am the creditor.
 I am the creditor's attorney or authorized agent.
 I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
 I am the guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 01-27-2024
MM / DD / YYYY

Anita L. Coots
Signature

Print the name of the person who is completing and signing this claim:

Name Anita Lee Coots
First Name Middle Name Last Name

Title Self

Company WFA
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 2226 E. Murray Holladay Rd #403
Number 2226 Street E. Murray Holladay Rd
City Salt Lake State UT ZIP Code 84117

Contact Phone 385-222-0245 Email jensenanita693@gmail.com

Account Number: [REDACTED]
 Statement Date: 1/1/2023 - 1/31/2023
 Page: 2 of 3

Checking

| Date | Transaction Description | Amount | Balance |
|-------------------------------------|---|----------|----------|
| ID 09: FREE CHECKING | | | |
| Balance Forward on 01/1/2023 | | | |
| 01/09/2023 | Withdrawal ACH TARGET DEBIT CRD Location - TARGET -1751 Salt Lake Cit UT / Terminal ID: 173 TYPE: ACH TRAN CO: TARGET DEBIT CRD | -34.85 | 111.93 |
| 01/09/2023 | Deposit by Check | 35.00 | 146.93 |
| 01/09/2023 | Withdrawal | -20.00 | 126.93 |
| 01/10/2023 | Withdrawal ACH TARGET DEBIT CRD Location - TARGET -1751 Salt Lake Cit UT / Terminal ID: 166 TYPE: ACH TRAN CO: TARGET DEBIT CRD | -34.63 | 92.30 |
| 01/10/2023 | Draft 3474 | -35.00 | 57.30 |
| 01/13/2023 | Deposit ACH TARGET CORPORATI TYPE: PAYROLL CO: TARGET CORPORATI | 169.70 | 227.00 |
| 01/13/2023 | Withdrawal ACH Ascend Loans TYPE: 8885127236 CO: Ascend Loans | -87.56 | 139.44 |
| 01/17/2023 | Withdrawal ACH TARGET DEBIT CRD Location - TARGET -1751 Salt Lake Cit UT / Terminal ID: 158 TYPE: ACH TRAN CO: TARGET DEBIT CRD | -5.32 | 134.12 |
| 01/17/2023 | Withdrawal ACH TARGET DEBIT CRD Location - TARGET -1751 Salt Lake Cit UT / Terminal ID: 174 TYPE: ACH TRAN CO: TARGET DEBIT CRD | -37.96 | 96.16 |
| 01/17/2023 | Withdrawal Overdrawn ACH GENESIS-FS CARD | -34.95 | 61.21 |
| 01/18/2023 | Deposit ACH XXSOC SEC TYPE: XXSOC SEC CO: XXSOC SEC | 1,592.00 | 1,653.21 |
| 01/18/2023 | Draft 3476 Point of Purchase Check - MACEY'S MURRAY Terminal City & State - WEST UT TYPE: PURCHASE | -127.30 | 1,525.91 |
| 01/18/2023 | Withdrawal ACH Ascend Loans TYPE: 8885127236 CO: Ascend Loans | -347.95 | 1,177.96 |
| 01/20/2023 | Withdrawal ACH TARGET DEBIT CRD TYPE: ACH TRAN CO: TARGET DEBIT CRD | -105.32 | 1,072.64 |
| 01/23/2023 | Withdrawal ACH TARGET DEBIT CRD Location - TARGET -1751 Salt Lake Cit UT / Terminal ID: 158 TYPE: ACH TRAN CO: TARGET DEBIT CRD | -5.60 | 1,067.04 |
| 01/23/2023 | Withdrawal ACH TARGET DEBIT CRD Location - TARGET -1751 Salt Lake Cit UT / Terminal ID: 165 TYPE: ACH TRAN CO: TARGET DEBIT CRD | -66.29 | 1,000.75 |
| 01/23/2023 | Withdrawal ACH GENESIS-FS CARD TYPE: RETRY PYMT CO: GENESIS-FS CARD NAME: COOTS ANITA | -100.00 | 900.75 |
| 01/24/2023 | Withdrawal ACH GENESIS-FS CARD TYPE: PAYMENT CO: GENESIS-FS CARD NAME: COOTS ANITA | -50.00 | 850.75 |
| 01/24/2023 | Draft 3481 Point of Purchase Check - MACEY'S HOLLADAY Terminal City & State - SALT UT TYPE: PURCHASE | -83.00 | 767.75 |
| 01/24/2023 | Draft 3482 | -221.31 | 546.44 |
| 01/25/2023 | Withdrawal ACH DeltaCare TYPE: PREMIUM CO: DeltaCare NAME: Anita L. Coots | -40.53 | 505.91 |
| 01/25/2023 | Withdrawal ACH LPG 949-229-6262 TYPE: DIRECT PAY CO: LPG 949-229-6262 | -214.10 | 291.81 |
| 01/26/2023 | Draft 3478 Processed Check - AMERIMARK ARC TYPE: PAYMENT | -35.00 | 256.81 |
| 01/26/2023 | Draft 3480 Processed Check - Rocky Mtn Power TYPE: Payment | -55.81 | 201.00 |
| 01/26/2023 | Draft 3484 | -79.12 | 121.88 |
| 01/27/2023 | Deposit ACH TARGET CORPORATI TYPE: PAYROLL CO: TARGET CORPORATI | 177.26 | 299.14 |
| 01/27/2023 | Draft 3479 | -64.78 | 234.36 |
| 01/30/2023 | Draft 3483 Processed Check - PAYMENT TYPE: PAYMENT | -50.00 | 184.36 |

Continued on next page

Account Number: [REDACTED]
 Statement Date: 2/1/2023 - 2/28/2023
 Page: 2 of 2

Checking

| Date | Transaction Description | Amount | Balance |
|---|--|----------|-----------------|
| ID 09: FREE CHECKING | | | \$431.61 |
| Balance Forward on 02/1/2023 | | | |
| 02/10/2023 | Deposit ACH TARGET CORPORATI TYPE: PAYROLL CO: TARGET CORPORATI | 55.14 | 55.38 |
| 02/13/2023 | Draft 3475 Processed Check - WALGREEN CO. TYPE: ECHECK | -2.46 | 52.92 |
| 02/13/2023 | Draft 3488 Point of Purchase Check - MACEY'S HOLLADAY Terminal City & State - SALT UT TYPE: PURCHASE | -46.34 | 6.58 |
| 02/15/2023 | Deposit ACH XXSOC SEC TYPE: XXSOC SEC CO: XXSOC SEC | 1,592.00 | 1,598.58 |
| 02/15/2023 | Draft 3489 Point of Purchase Check - MACEY'S HOLLADAY Terminal City & State - SALT UT TYPE: PURCHASE | -161.69 | 1,436.89 |
| 02/15/2023 | Withdrawal ACH TARGET DEBIT CRD TYPE: ACH TRAN CO: TARGET DEBIT CRD | -165.02 | 1,271.87 |
| 02/16/2023 | Withdrawal ACH GENESIS-FS CARD TYPE: PAYMENT CO: GENESIS-FS CARD NAME: COOTS ANITA | -150.00 | 1,121.87 |
| 02/21/2023 | Withdrawal ACH TARGET DEBIT CRD TYPE: ACH TRAN CO: TARGET DEBIT CRD | -50.08 | 1,071.79 |
| 02/21/2023 | Draft 3412 Point of Purchase Check - WALGREENS Terminal City & State - SALT UT TYPE: PURCHASE | -53.60 | 1,018.19 |
| 02/21/2023 | Withdrawal ACH Ascend Loans TYPE: 8885127236 CO: Ascend Loans | -172.99 | 845.20 |
| 02/21/2023 | Withdrawal | -50.00 | 795.20 |
| 02/22/2023 | Draft 3411 Processed Check - AMERIMARK ARC TYPE: PAYMENT | -35.00 | 760.20 |
| 02/22/2023 | Draft 3410 | -64.78 | 695.42 |
| 02/27/2023 | Withdrawal ACH DeltaCare TYPE: PREMIUM CO: DeltaCare NAME: Anita L. Coots | -40.53 | 654.89 |
| 02/27/2023 | Withdrawal ACH TARGET DEBIT CRD TYPE: ACH TRAN CO: TARGET DEBIT CRD | -60.93 | 593.96 |
| 02/27/2023 | Withdrawal ACH LPG 949-229-6262 TYPE: DIRECT PAY CO: LPG 949-229-6262 | -214.10 | 379.86 |
| 02/28/2023 | Withdrawal ACH COOTS,ANITA L TYPE: UTAH FIRST CO: KEY BANK NAME: COOTS,ANITA L | -300.00 | 79.86 |
| Your FREE CHECKING Ending Balance 02/28/2023 | | | \$79.86 |
| 4 Share Deposits \$1,726.61 | | | |
| 23 Share Withdrawals (\$2,078.36) | | | |

Share Savings

| Date | Transaction Description | Amount | Balance |
|--|-------------------------|--------|---------------|
| ID 01: BASE SHARE | | | \$7.46 |
| Balance Forward on 02/1/2023 | | | |
| Your BASE SHARE Ending Balance 02/28/2023 | | | \$7.46 |
| 0 Share Deposits \$0.00 | | | |
| 0 Share Withdrawals \$0.00 | | | |

YTD Summary

| | |
|----------------|--------|
| Dividends Paid | \$0.00 |
|----------------|--------|

09/30/2021 Statement.pdf [00090000R0B8FSNI]

Account Number: [REDACTED]
 Statement Date: 9/1/2021 - 9/30/2021
 Page: 2 of 2

Checking

| Date | Transaction Description | Amount | Balance |
|---|--|---------|-------------------|
| ID 09: FREE CHECKING | | | \$1,201.87 |
| Balance Forward on 09/1/2021 | | | |
| 09/17/2021 | Withdrawal | -50.00 | 2,095.39 |
| 09/17/2021 | Draft 3314 | -200.00 | 1,895.39 |
| 09/20/2021 | Draft 3312 | -383.09 | 1,512.30 |
| 09/20/2021 | Draft 3318 | -383.09 | 1,129.21 |
| 09/20/2021 | Draft 3322 | -100.00 | 1,029.21 |
| 09/21/2021 | Draft 3320 | -64.72 | 964.49 |
| 09/22/2021 | Draft 3323 Point of Purchase Check - MACEY'S HOLLADAY Terminal City & State - SALT UT TYPE: PURCHASE | -127.67 | 836.82 |
| 09/27/2021 | Withdrawal ACH LPG TYPE: 9492296262 CO: LPG | -214.10 | 622.72 |
| 09/28/2021 | Withdrawal ACH AR-MANAGEMENT TYPE: 00107 CO: AR-MANAGEMENT | -49.83 | 572.89 |
| 09/28/2021 | Draft 3326 | -91.16 | 481.73 |
| 09/29/2021 | Withdrawal ACH TARGET DEBIT CRD TYPE: ACH TRAN CO: TARGET DEBIT CRD | -6.85 | 474.88 |
| 09/29/2021 | Withdrawal ACH ALLSTATE INS CO TYPE: INS PREM CO: ALLSTATE INS CO | -24.41 | 450.47 |
| 09/29/2021 | Draft 3324 Processed Check - PAYMENT TYPE: PAYMENT | -50.00 | 400.47 |
| 09/29/2021 | Withdrawal ACH ALLSTATE INS CO TYPE: INS PREM CO: ALLSTATE INS CO | -63.91 | 336.56 |
| 09/29/2021 | Withdrawal ACH TARGET DEBIT CRD TYPE: ACH TRAN CO: TARGET DEBIT CRD | -98.21 | 238.35 |
| 09/30/2021 | Deposit ACH TARGET DEBIT CRD TYPE: ACH TRAN CO: TARGET DEBIT CRD | 2.63 | 240.98 |
| Your FREE CHECKING Ending Balance 09/30/2021 | | | \$240.98 |
| 3 Share Deposits \$1,455.51 | | | |
| 23 Share Withdrawals (\$2,416.40) | | | |

Share Savings

| Date | Transaction Description | Amount | Balance |
|--|--|--------|----------------|
| ID 01: BASE SHARE | | | \$57.44 |
| Balance Forward on 09/1/2021 | | | |
| 09/30/2021 | Deposit Dividend | 0.01 | 57.45 |
| | Annual % Yield Earned Ending 09/30/2021 0.070% | | |
| Your BASE SHARE Ending Balance 09/30/2021 | | | \$57.45 |
| 1 Share Deposits \$0.01 | | | |
| 0 Share Withdrawals \$0.00 | | | |
| YTD Share Dividends \$0.04 | | | |

YTD Summary

| | |
|----------------|--------|
| Dividends Paid | \$0.04 |
|----------------|--------|